For every child: Universal early childhood education and care

Submission to Productivity Commission inquiry into early childhood education and care

Early Childhood Australia
January 2024

EVERY
YOUNG
CHILD IS
THRIVING
AND
LEARNING

About us

Early Childhood Australia (ECA) is a not-for-profit, membership-based organisation that was first incorporated in 1938. We work nationally and locally, with active State and Territory Committees in each Australian jurisdiction and a National Board of Directors.

Our vision is that every young child is thriving and learning. To achieve this, we champion the rights of young children to thrive and learn at home, in the community, within early learning settings and through the early years of school. Our work builds the capacity of our society and the early childhood sector to realise the potential of every child during the critical early years from birth to the age of eight.

ECA acknowledges the unique place of Aboriginal and Torres Strait Islander peoples in our society, the past and current injustices and realities for them across Australia, and the enduring strength of their cultures and identities. We commit to being at the forefront of achieving a reconciled nation that values, respects and celebrates Aboriginal and Torres Strait Islander ways of knowing and being.

Find out more at: www.earlychildhoodaustralia.org.au

Contact

Samantha Page	Dr Sarah Wight
CEO, Early Childhood Australia	Education Policy and Research Executive

Acknowledgement of Country

Early Childhood Australia acknowledges the Traditional Custodians of Country throughout Australia and their continuing connection to land and community. We pay our respect to them and their cultures, and to the Elders both past and present.

National Office 3/16 Mildura Street Fyshwick ACT 2609 T: 02 6242 1800 E: eca@earlychildhood.org.au W: www.earlychildhoodaustralia.org.au

ABN 44 950 767 752

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Executive summary

Early Childhood Australia (ECA) welcomes the opportunity to respond to the draft report from the Productivity Commission's inquiry into universal early childhood education and care (ECEC). This represents an opportunity to make positive and enduring changes to deliver better outcomes for young children and their families. ECEC matters in the everyday lives of children and families in Australia, providing:

- quality early experiences for children as our youngest citizens, having impacts beyond today and translating to improved academic achievement and wellbeing at school and better post-school options
- partnership for families in their role as children's first educators through parent/carer messaging, access to integrated services, and daily interactions with families
- support for families so that they can access employment, training, study and volunteering options
- culturally-safe, inclusive, child-centred spaces and places where children can grow, learn and develop, and be visible within their communities.

ECA supports the Productivity Commission's conclusion that a universal ECEC system means making quality services accessible to all children and families. We believe that ECEC beyond 2024 should be the entitlement of every child; not a provision based on the activity of parents or carers, nor post code or proximity to a major city. A universal system also needs to be inclusive and culturally responsive, which relies on a professional and valued workforce.

ECA notes and affirms the national commitment of the Australian Government to ECEC. This is important for children as our youngest citizens and the rights and opportunities afforded to them within contemporary Australia; to families as children's first educators with hopes and aspirations for their children, and as contributors through employment, training, study, volunteering and in their role nurturing and caring for children; and for broader Australian society, its people, and cultural and financial prosperity.

ECA commends the work commissioned by Education Ministers to develop a shared vision for ECEC. We anticipate that the vision will encompass the benefits to children as well as the benefits to families and carers. We also anticipate that the vision will reference the importance of quality and the role of early childhood educators and teachers as fundamental to delivering high quality services. The concept of inclusion is important in setting a vision because it is of critical importance in achieving a universal system of ECEC. In our *Statement on Inclusion* we define inclusion as 'every child has access to, participates meaningfully in, and experiences positive outcomes from early childhood education and care programs'.[1] This positively framed commitment offers an alternative to focussing on barriers and language of deficit.

We are in agreement with the Productivity Commission that the vision be adopted as the foundation for a new National Partnership Agreement between the Federal Government and the State/Territory Governments. ECA proposes that a universal approach which can be delivered effectively at scale, also needs sufficient flexibility so that ECEC provision is contextually relevant to local communities and ECEC users, children and families. Broadening the reach of universal services and enriching universal delivery is an imperative, as is ensuring that changes are not regressive and any interim measures are a bridge to foundational changes, carefully guided by an ECEC Commission as the steward of an integrated system.

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[1] Early Childhood Australia (ECA), *Statement on the Inclusion of Every Child in Early Childhood Education and Care* (Canberra: ECA, 2016), https://www.earlychildhoodaustralia.org.au/wp-content/uploads/2014/01/Statement-of-Inclusion-2016.pdf

Summary of recommendations

In ECA's June 2023 submission to the Productivity Commission inquiry, *Moving from Vision to Action on Universal Early Childhood Education and Care[2]*, the following model was proposed for the ECEC reform agenda. Access, Affordability, Inclusion and Stability were put forward as four pillars to underpin the framing of universal provision and now entitlement of young children in Australia.

Figure 1: Four Pillars (Early Childhood Australia, 2023, p. 6)

Further to this work, ECA puts forward the following recommendations for consideration:

Pillar 1: Access

ECA recommendation 1: That the Australian Government enshrines in legislation the entitlement of every child to ECEC, with access where they live regardless of families' workforce status for a minimum of three days a week or 30 hours.

ECA recommendation 2: That the universal provision of ECEC reflects the diversity of contexts, communities, families and children who currently or may in the future, access ECEC services.

ECA recommendation 3: That mixed funding models reflect proportionate universalism where one size does not fit all; instead mixed funding models support viability and growth of complementary ECEC service types for families and children where they live.

ECA recommendation 4: That a supply-side funding model is developed to address the needs of unserved or underserved communities with in-built flexibility to enable responsiveness to community need.

ECA recommendation 5: That significant changes to governance structure and funding of ECEC are considered by Australian Governments to better align Commonwealth and state/territory responsibilities and remove complexity and replication.

ECA recommendation 6: That the proposed ECEC Commission, with the remit, powers and funding, provides stewardship across the ECEC sector with consultation with states and territories and key stakeholders in the ECEC system in how that Commission will function.

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[2] Early Childhood Australia (ECA). (2023, June). *Moving from vision to action on universal early childhood education and care. Submission to Productivity Commission Inquiry into Early Childhood Education and Care.* https://www.pc.gov.au/__data/assets/pdf_file/0005/362570/sub154-childhood.pdf

ECA recommendation 7: That mechanisms are put in place to promote and deliver greater consistency between state and territory regulatory authorities, with more tailored approaches for different service types (e.g. OSHC and in-venue care) to promote quality practice and to realise different solutions for different contexts.

ECA recommendation 8: Building on the strength and success of the *National Quality Framework* (NQF), national Education Ministers commit to a forward-looking review of the NQF including the nature and frequency of assessment rating processes.

Pillar 2: Affordability

ECA recommendation 9: Immediately remove or significantly modify the Child Care Subsidy Activity Test to improve access for children in low income families with insecure or irregular employment.

ECA recommendation 10: That the Australian Government develop a principal funding model which is simple and offers certainty for families about their out-of-pocket costs and also allows ECEC services to strategically plan for infrastructure, workforce and operations.

ECA recommendation 11: That funding should be appropriate to the age of children as an age-based subsidy or age-based funding mechanism to better reflect the different costs in providing ECEC to children of different ages and complying with the National Law and Regulations.

Pillar 3: Inclusion

ECA recommendation 12: That immediate and improved measures to support inclusion in ECEC settings are undertaken, while foundational changes to the inclusion ecosystem are co-designed with the ECEC sector and implemented.

ECA recommendation 13: That Inclusion Agencies are appropriately funded to work with the ECEC sector to build educator capacity, and support services to embed and sustain inclusive practices.

ECA recommendation 14: That ECEC funding for services is timely, effective and sufficiently flexible to enable services to embed and sustain inclusion as needed by the setting, whether this is through additional educators or other investment by the service to positively impact children's outcomes.

ECA recommendation 15: That the Australian Government, the Australian Early Childhood Education and Care Quality Authority (ACECQA) and the Australian Institute of Teaching and School Leadership (AITSL) mandate greater emphasis on embedding evidence-informed inclusive practices and environments in core content of early childhood qualifications.

ECA recommendation 16: That the Australian Government commits to funding for a national program of professional learning for ECEC services with the intent to strengthen, embed and sustain inclusive practices across ECEC services.

Pillar 4: Stability—a valued workforce

ECA recommendation 17: That parity in pay and conditions between degree, Diploma and Certificate III educators employed in school settings and those employed in ECEC services is achieved. This requires structural reform, through multi-employer bargaining in the first instance and government investment over the long-term.

ECA recommendation 18: That systems of mentorship and support are established and formalised through a nationally funded program to encourage the retention, growth of and support for the existing ECEC workforce, and for newly qualified educators entering into the ECEC sector.

ECA recommendation 19: That the Australian Government examines and acts to remove significant barriers to upskill, qualify and to promote professional recognition by nationally consistent registration with state and territory regulators for all degree, Diploma and Certificate III educators.

Response to PCI draft recommendations

Draft recommendation 5.1: Support universal access in persistently thin markets via supply-side funding

In place of 'thin markets', ECA supports the language of the Australian Competition and Consumer Commission (ACCC) *Childcare Inquiry Final Report* of *unserved, under-served* and *adequately served*.[3] However in place of 'markets', ECA suggests the use of children, families and communities to reflect a child and family-centred focus.

The provision of quality ECEC is clearly important but so too is choice and flexibility. Some families need longer hours of education and care, others prefer their children to attend shorter sessions—as evidenced by the pattern of use across long day care and kindergarten or preschool programs. Some families prefer home-based or flexible models such as Family Day Care (FDC) or in-venue-care. Working families may prefer to access a service co-located with a school or close to either their workplace or home depending on their circumstances. For some communities, programs in which families stay and participate (Families as First Teachers, playgroup and bush kinder) may be an important part of the mix of offerings available. Options for isolated families such as school-of-the-air and mobile services are also important models to foster.

A healthy and vibrant ECEC sector recognises the strengths of the complementary education and care types and promotes quality improvement for every service.

Decision-making about universal access in communities that are unserved or underserved should be shared with the community themselves. The needs of unserved and under-served communities are varied. For some communities, meeting operating costs may not be unreasonable, but the capital building and set up costs prohibitive. Here, grant funding would be entirely appropriate to set up a new ECEC service, or expand an existing ECEC service.

For other unserved or underserved communities unable to sustain the operating costs, clear intervention is needed to enable children to access their educational entitlement where they live and when it is needed. For these communities, sustained and enduring funding is needed to establish and operate ECEC services. This supports a tiered and nuanced approach to supply-side funding to ensure that unserved and underserved communities are given a voice in the ECEC provision in their communities, and the capacity to establish and maintain ECEC services where there would be none.

ECA supports the co-design of programs with Aboriginal Community Controlled Organisations (ACCOs) who have demonstrated leadership in multi-purpose and integrated models of support for children and families in many First Nations communities. Through the work of organisations such as SNAICC, co-design with ACCOs can be highly contextualised and innovative. Providing sustainable and enduring funding models with partners who are committed to working with ACCOs and communities, families and children is important. Relationships, trust and co-design are processes which take time and commitment is necessary to establish and nurture these partnerships. Partners undertaking this work need to be involved as early as possible to engage in conversation and consultation with community about their needs, hope and aspirations for their children and young people and the place of ECEC within their context.

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[3] Australian Competition and Consumer Commission (ACCC), *Childcare Inquiry. Final Report December 2023.* (Canberra: Commonwealth of Australia, 2024), https://www.accc.gov.au/system/files/ACCC%20Childcare%20Inquiry-final%20report%20December%202023.pdf

ECA suggests that consideration is needed for innovative approaches, particularly for rural, remote and isolated families where traditional service models may not be viable or appropriate but children's right to quality early education and care should still be addressed.

Draft recommendation 3.1: Reduce barriers to educator upskilling

ECA acknowledges the complexity of qualifications and teacher registration in the many state and territory jurisdictions. Proposed changes to qualifications need to consider current constraints and barriers to achieving consistency, to improve the enrolment and completion numbers of prospective early childhood teachers.

Where we see inconsistencies in different jurisdictions around teacher registration, we see these inconsistencies translated across Initial Teacher Education (ITE) courses. These differences are also reflected in how articulation, Recognition of Prior Learning (RPL) and credit transfers are handled in alignment with the *Australian Qualifications Framework*[4] by ACECQA and AITSL.

Where accelerated degree programs exist or are introduced, it is important that the status and professional recognition that the ECEC sector has fought so hard for, is not undermined by perceptions of a minimised or less robust academic program to become an early childhood teacher. Guidance and clear articulation of expectations from ACECQA about how an accelerated program of study still meets and potentially exceeds requirements for recognition as an early childhood teacher would support this.

Lower rates of university enrolment, accompanied with increasing attrition rates, suggest that greater or more targeted wraparound supports for pre-service educators would be worthy of further consideration. Similarly flexible modes of delivery for educators working in the ECEC sector is supported. This may look like part-time, online or flexible delivery, but with a focus also on building collegial professional connections across cohorts to promote professional identity and recognition and the relational skills so important in ECEC.

It is arguable that the presence of LANTITE (Literacy and Numeracy Test for Initial Teacher Education) has had impacts on enrolments into early childhood degrees (those which are dual-accredited with AITSL i.e. Birth–8, Birth–12). LANTITE may act as a deterrent for upskilling. Where teachers already have registration status, LANTITE is not a logical inclusion. This is also inconsistent when compared with other qualifications such as Graduate Certificates and Diplomas, and of course the Diploma and Certificate III 'top-up' combination which do not require LANTITE. Consideration and consensus by ACECQA, AITSL and the regulatory authorities to ensure that teachers seeking to upskill are choosing the best and most appropriate qualification pathway to meet their goals and needs of the sector, rather than to avoid complying with LANTITE and the Teacher Performance Assessment (TPA) requirements. There is limited data on the relationship between LANTITE and teacher efficacy and effectiveness, but its impacts on diversity are already becoming evident.[5]

Mentorship not only for pre-service teachers, but mentorship of early career teachers and new leaders also is likely to strengthen the profession.[6] Consideration of mentor qualifications, experience and attributes, their accessibility, particularly for Aboriginal and Torres Strait Islander, Culturally and Linguistically Diverse (CALD), regional and remote ECEC educators, is necessary. Robust and purposeful monitoring and evaluation is welcome, however should not pose undue burden to ECEC services and the sector more broadly.

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[4] Australian Qualifications Framework Council, *Australian Qualifications Framework (2nd edn.)*, (South Australia: Australian Qualifications Framework Council, 2013), https://www.aqf.edu.au/framework/australian-qualifications-framework
[5] Alison L. Hilton and Rebecca Saunders, "LANTITE's impact on teacher diversity: Unintended consequences of testing pre-service teachers" *Aust. Educ. Res*. (2023), https://doi.org/10.1007/s13384-023-00628-6
[6] Jennifer M. Longley and Jennifer M. Gilken, "Mentoring in Early Childhood Settings: Elements of Effective Relationships," *Dimensions* 48, no. 1 (2020): 17-21. EJ1292491.pdf (ed.gov)

Wellbeing should be an important consideration for Registered Training Organisations (RTOs) and universities, most particularly with cohorts of students who are already employed within the ECEC sector. Research from Monash University revealed entrenched issues in the Australian education sector, which contributed to high stress levels[7] and that educators who are employed while taking on additional study may be impacted by stress at higher rates.

The Monash study[8] found that there is a growing body of evidence that links educator wellbeing with educational outcomes for children and young people and that existing educator wellbeing initiatives place too much focus on self-care and individual strategies. Federal, together with state and territory, governments should focus more broadly on the systemic change required to provide educators and providers with the necessary resources, work conditions and support that is essential to safeguarding their wellbeing. Be You as a national government funded mental health in education initiative is well placed to support this.

ECA recommends that ACECQA should examine the supervised professional experience required in order for an early childhood teaching qualification to be approved for the purposes of the NQF. For dual-accredited degrees with ACECQA and AITSL, it is more complex to meet both sets of requirements and consideration around greater flexibility in how supervised professional experiences are conducted will require agreement and alignment from both ACECQA and AITSL.

Draft recommendation 3.2: Support innovative delivery of teaching qualifications

ECA is supportive in principle of modest incentives being offered to universities for innovative approaches to attract, support and retain pre-service teachers (ECTs).

Innovative approaches may include:

- greater flexibility around how placement days are undertaken to allow pre-service teachers (PSTs) to juggle the demands of existing employment and other commitments
- pre-service teachers allowed to undertake their placement days within their place of employment
- qualified primary teachers able to complete topic content with some Work Integrated Learning (WIL), and then undertake the balance as a Graduate Teacher Program, akin to the Graduate Nurse Program where they are able to work as an ECT but are mentored and undertake the practical placement over time and embedded within a service
- greater emphasis on supported regional placements for groups of students with stipend payments to offset any financial impediments
- greater focus on connection of program content to real world settings, partnerships and application of theory to practice in situ
- clear focus on collaboration and integrated service delivery with other professionals (e.g. maternal and child health nurses, doctors, occupational therapists, speech pathologists etc.)
- greater focus on transitions and quality transition practices for children and families as they move between different educational settings
- further attention on early childhood leadership and career pathways within ECEC qualifications.

[7] Be You, *Beyond Self-Care: An Educator Wellbeing Guide* (Be You, 2023), https://beyou.edu.au/resources/educator-wellbeing-guide
[8] Keith C. Herman, Jal'et Hickmon-Rosa and Wendy M. Reinke, "Empirically Derived Profiles of Teacher Stress, Burnout, Self-Efficacy, and Coping and Associated Student Outcomes," *Journal of Positive Behavior Interventions* 20, no. 2 (2018): 90-100. EJ1173521.pdf (ed.gov)

Draft recommendation 3.3: Improve registration arrangements for early childhood teachers

ECA advocates for a consistent national approach towards teacher registration. The recent *Review of Child Safety Arrangements*[9] under the NQF undertaken by ACECQA proposed a stronger registration regime for teachers and educators working in early childhood settings. This builds on previous recommendations from the Australian Institute for Teaching and School Leadership (AITSL) to include ECTs in teacher registration regimes and make that nationally consistent. It also aligns to the National Workforce Strategy. ECA supports a nationally consistent approach to registration for both teachers and educators; this requires collaboration across jurisdictions and investment to resource registration mechanisms.

ECA firmly believes that early childhood teachers deserve the same recognition as their primary and secondary colleagues and that nationally consistent recognition would ensure consistency and fairness regardless of the setting in which teachers are employed. Commitment by the Australian Government to national consistency would be welcome and subsequent consultation with ACECQA, AITSL, jurisdictional regulators and other stakeholders could inform such a move and address any concerns. National consistency could finally see inclusion all early childhood teachers and educators, with a clear classification system to differentiate the array of qualifications currently found across the sector. It is highly unlikely national consistency will eventuate without the intervention and leadership of the Australian Government.

ECA believes that nationally consistent registration requirements and alignment of qualifications for ECTs is needed to ensure that they are recognised and valued as teachers regardless of their employment setting. The following five principles should inform any reform going forward:

1. A teacher is a teacher—ECTs should be recognised, valued and treated as part of the broader teaching profession. A profession with distinct knowledge and practice requirements based on who, where and how they teach.

2. Requirements for teaching qualifications should be upheld to a high standard.

3. A broad range of qualification structures are currently recognised in early childhood education, however consistency in course length and child age range is needed.

4. Teacher registration should be inclusive of ECTs and applicable for all teaching settings.

5. Diversity in the teaching profession should be valued and prioritised— barriers to starting and completing qualifications need to be identified and addressed.

ECEC qualifications can be viewed as a continuum, and ECA suggests that positive conditions should be present for Certificate III and Diploma educators to upskill through university study to a degree-qualified early childhood teacher. Professional acknowledgement of early childhood teachers and their Diploma and Certificate III qualified colleagues would elevate the status of ECEC, acknowledging the professionalism, demands, knowledge, expertise and practice of early childhood teachers via nationally consistent registration with their relevant state and territory statutory authorities, and educators by a sub-register of the same.

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[9] *Australian Children's Education and Care Quality Authority (ACECQA), Review of Child Safety Arrangements Under the National Quality Framework Executive Summary – Findings and Recommendations for the NQF and Inter-Related Child Safety Mechanisms* (2023, December), https://www.acecqa.gov.au/media/39911

Figure 2: Australian Qualifications Framework (AQF Council, 2013, p. 19)

Figure 3: Model of Progression (AQF, 2013)

Low numbers of early childhood teachers recognised as Highly Accomplished and Lead Teachers (HALT) should also be a consideration when exploring inconsistencies in registration and registration requirements across Australia. Recognition through teaching registers could be explored, and with the cooperation of ACECQA, AITSL and state and territory regulators, consideration also given as to how HALT could be applied beyond only AITSL-accredited degrees.

Draft recommendation 3.4: Lift support and mentoring for new early childhood teachers

Retention of graduate early childhood teachers in ECEC settings should not be ad hoc and left to chance. For newly-qualified early childhood teachers, their ability to cope, let alone thrive, starts with the knowledge, experience and preparation of graduates from the tertiary institutions, and also encompasses the individual's capacity, the ECEC setting and sector more broadly. Mentoring and support programs for new early childhood teachers are valuable strategies to support a stable ECEC workforce. Ensuring new ECTs are working within a mentally healthy workplace will assist them to develop and thrive and grow. Research by Monash University[10] identified six interconnected elements that contribute to educator wellbeing.

 Individual educator factors include:

- collegial relationships

- workplace culture

- leadership

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[10] Be You, *Beyond self-care: An educator wellbeing guide* (Be You, 2023), 6, https://beyou.edu.au/resources/educator-wellbeing-guide

- community

- governance and policy

ECA proposes that articulating, planning for and implementing three of these elements at service and provider level should underpin and support structured mentoring programs. That is, by fostering collegial relationships, a positive workplace culture, and strong leadership, early childhood teachers enter into an environment which recognises their knowledge, qualifications and professional experience, but also has a vested interest in developing their expertise. With lower numbers of school leavers and job-changers entering into ECEC degrees, coupled with challenges retaining early childhood teachers in the sector,[11] what is clear is that a new, intentional approach is needed. ECA as a peak body for ECEC, with its broad and deep membership base, partnerships with key stakeholders, and expertise as the national, prior to school delivery partner of the *Be You* program, is well positioned to consult and liaise with key stakeholders of the ECEC ecosystem.

The Draft Early Years Strategy 2024-2034 describes 'stacking the scales'[12] with protective factors to drive good outcomes for all children. As well as inclusion of content about social-emotional development in ECEC qualifications, mentoring can be highly effective for graduates to build capacity with an in-depth understanding of social and emotional learning and why it is important for mental health and wellbeing. This can promote protective factors and mitigate risk factors within the setting. Comprehensive programs such as the Be You suite of offerings can positively impact ECEC services, educators and the children and families who access ECEC in these settings. Through evaluations, the nationally available Be You program and mentoring was shown to positively impact educator efficacy and knowledge of mental health and their capacity to support children's health and wellbeing. Participating educators were also more likely to have positive wellbeing themselves. It is important to make available to graduates and experienced educators, evidence-informed programs and mentoring which is ongoing, funded and embedded in everyday practice.

Draft recommendation 3.5: Improve pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications

ECA supports and advocates for improved pathways for Aboriginal and Torres Strait Islander people to enrol, engage and complete ECEC qualifications. For Government, working *with* Aboriginal and Torres Strait Islander people to better articulate improved pathways to obtain ECEC qualifications reflects 'policy partnerships' of 'Priority reform one – Formal partnerships and shared decision-making'.[13] The design of any pathways must be in conjunction with ACECQA, AITSL and the state and territory regulators to ensure that pathways are appropriate and useful, resulting in recognised and accredited ECEC qualifications.

Enduring and adequate resourcing to provide tailored, small group and one-on-one, place-based, in-community supports for Aboriginal and Torres Strait Islander students enrolled in ECEC qualifications, to complete is important. This should be complemented by a culturally safe and responsive learning environment and curriculum

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[11] Paula McDonald, Karen Thorpe and Susan Irvine, Low Pay but Still We Stay: Retention in Early Childhood Education and Care. *Journal of Industrial Relations* (2018), *60*(5), 647-668. https://doi.org/10.1177/0022185618800351

[12] Department of Social Services (DSS), *The Draft Early Years Strategy 2024-2034 – For Consultation* (Canberra: Australian Government, 2023), 26. https://engage.dss.gov.au/wp-content/uploads/2023/12/draft-consultation-early-years-strategy.pdf

[13] Coalition of Aboriginal and Torres Strait Islander Peak Organisations, and all Australian Governments, Commonwealth of Australia , New South Wales, Victoria, Queensland, Western Australia, South Australia, Tasmania, the Australian Capital Territory, the Northern Territory, and the Australian Local Government Association, *National Agreement on Closing the Gap.* (Canberra: Department of the Prime Minister and Cabinet, 2020), 5.

for Aboriginal and Torres Strait Islander people. Curriculum should be co-designed and informed by Aboriginal and Torres Strait Islander people.

Innovative approaches are needed to encourage and support Aboriginal and Torres Strait Islander people to engage with and complete ECEC qualifications in community. Curriculum in ECEC qualifications should be contextualised and relevant to preservice teachers and educators, while still maintaining robustness and rigour. These are not mutually exclusive. An intentional consultation process with key stakeholders would be welcome to address how preservice educators and teachers could undertake practicums within their own remote communities. This would remove a significant impediment to Aboriginal and Torres Strait Islander people from completing ECEC qualifications. ECA could work as a partner to provide support to community in relation to governance, operations and compliance matters, to complement community knowledge and ways of knowing and being.

Working with and in support of Aboriginal and Torres Strait Islander people who choose to qualify and work in their community, offers considerable benefit to the children and families who they serve through ECEC. Having a skilled, qualified and local workforce ensures the community, and its histories, knowledge systems, cultures, values and language, are valued and underpin the ECEC service.

Thinking pragmatically around the specific barriers that Aboriginal and Torres Strait islander students face when engaging with and completing ECEC qualifications is important. ECA is prepared to work with ACECQA and state and territory regulatory authorities to consider innovative ways to overcome current impediments, such as the possibility of learning and teaching of practice and assessments completed in situ in community by ECEC qualified Inclusion Professionals (with Certificate IV Training and Assessment – Workplace Training). ECA propose this as a model for further consideration and trial in specific regional council areas. Access is an inclusion principle. Services not being opened or operated due to no qualified staff in remote areas is an inclusion issue and this approach would go a long way to bringing the principles of inclusion into the mainstream ECEC 'ecosystem'.

In the wake of the findings of the *2023 Closing the Gap Annual Report* and the *2024 Implementation Plan*, the announcement of the National Aboriginal and Torres Strait Islander Commissioner for Children is a positive and important step. ECA supports genuine systemic change to positively impact outcomes for Aboriginal and Torres Strait Islander children. The Commissioner will be an important voice in the policy reform agenda and ECA in its capacity as a peak body for the ECEC sector, is committed to working with and in support of the National Aboriginal and Torres Strait Islander Commissioner for Children to give voice to Aboriginal and Torres Strait Islander children, families and communities in decisions which impact them.

Draft recommendation 3.6: Contribute to professional development for the ECEC workforce

Sustained government contribution to the professional learning of the ECEC workforce is supported by ECA. Currently some degree of support towards professional learning is in place in states and territories but inconsistently funded, applied and delivered. There are differences also across systems (i.e. government and non-government), and in how early childhood teachers, and Diploma and Certificate III educators are able to access professional learning opportunities. With a focus on improving quality and inclusivity in ECEC settings, it is important that all ECEC staff can access quality and impactful professional learning opportunities alongside their

colleagues. Professional learning in isolation is unlikely to shift practice and improve outcomes for children, instead a culture of collaborative professionalism becomes everyday work together.[14]

Two state funded programs delivering professional learning to increase capability include Kindy Uplift (QLD) and School Readiness Funding (VIC), summarised below.

Practice Example: School Readiness funding

School Readiness Funding is a permanent and ongoing part of the Victorian kindergarten funding model.

School Readiness Funding supports 3-year-old and 4-year-old children in all ECEC services delivering state-funded kindergarten programs in Victoria, including long day care.

The amount of School Readiness Funding each service receives is based on the level of need of the children enrolled at their service. This is informed by parental occupation and education data (also known as Student Family Occupation and Education (SFOE data) as this is considered an accurate predictor of educational disadvantage. Similarly, SFOE data is used in schools to allocate 'needs-based' funding. Funding for each service ranges between: $1,000 for services with lower levels of need and/or small enrolment numbers more than $200,000 for services with higher levels of need and large enrolment numbers.

Each year, approved providers are required to work with their Early Childhood Improvement Branch to develop a School Readiness Funding Plan for each of their services. These annual plans should use local and service-level data to determine the needs of each service. Approved providers are also required to complete a mid-year review and an end-of-year acquittal to confirm how the School Readiness Funding for each of their kindergarten services has been spent.

Services will spend most of their School Readiness Funding on items from the menu of evidence-informed programs and supports (the menu). Items on the menu align with the 3 School Readiness Funding priority areas:

- Communication (language development)

- Wellbeing (social and emotional)

- Access and inclusion

Practice Example: Kindy Uplift

From 2024, the Queensland Government is increasing its investment in early childhood education, inviting all approved kindergarten providers to participate in Kindy Uplift. Kindy uplift funding will be used to respond to children's learning and development needs through evidence-based initiatives that lift outcomes for kindergarten children.

Kindy Uplift can be used to fund programs, resources, supports and professional development to build educator capability and support inclusion in all approved kindergarten programs, including sessional and long day care kindergarten services. Kindy Uplift focuses on six priority areas:

- Culturally safe, inclusive and responsive kindergarten programs

- Embedding Aboriginal and Torres Strait Islander perspectives

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[14] Michael Fullan and Andy Hargreaves, *Bringing the Profession Back In: Call to Action.* (Ohio: Learning Forward, 2016).

- Equity and Access for all

- Social and emotional learning

- Physicality

- Executive function

- Oral language and Literacy

- Mathematics and numeracy

Services will engage with their Kindy Uplift plan online to demonstrate how funding is used to improve outcomes for Kindergarten children.

Draft recommendation 3.7: Improve the ECEC Workforce Strategy

Securing the ECEC workforce and delivering on the plan, *'Shaping our future' A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022–2031*[15] requires agility and flexibility to be responsive to the growing need for Certificate III and Diploma educators and early childhood teachers, in both recruitment and retention. ECA believes that the ECEC Workforce Strategy has identified the right priorities for action, but has not been adequately resourced to substantially strengthen the workforce quickly enough to turn around the rates of turnover and provide stability.

Strategies to address shortages and stabilise the ECEC sector need to be substantial in terms of scale because this is a large workforce. The proposed ECEC Commission working with Australian Governments, and with stewardship across the ECEC sector, could be positioned to liaise and drive initiatives and to pick up the work of measuring, collecting and collating data to track progress against the objectives. The ECEC Commission would need appropriate resourcing to pursue this important work, maximising the impact of the ECEC Workforce Strategy through robust and effective evaluation and reporting measures.

In 2022, ECA commissioned ORIMA to undertake research to explore the experience of ECEC teachers and educators who have left the sector and find out why they left the sector, their experiences of working in the sector, and what might encourage them to return. This small study was conducted to seek preliminary findings and to develop a proof of concept to build a case for further, larger-scale studies to be undertaken to understand the needs of the ailing workforce. The research included a sample of 100 respondents who had left the early childhood sector in the last five years. The survey adopted both quantitative and qualitative methods and was supplemented by three online focus groups comprising 16 of the respondents who indicated their willingness to participate when completing the survey. We would support this type of work being repeated at scale and across jurisdictions to properly capture the voice of educators and teachers.

The ORIMA research explored the experience of ECEC teachers and educators who had left the sector and find out what attracted them to sector in the first place, their experiences working in the sector, the reasons they left the sector, and what might encourage them to return. For 76% of the early childhood education professionals surveyed, 'love of children' was the leading reason why educators entered the workforce. This was supported in the qualitative research too, which reinforced the important role educators played in the early years of a child's

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[15] Education Services Australia,*'Shaping Our Future' A Ten-Year Strategy to Ensure a Sustainable, High-Quality Children's Education and Care Workforce 2022–2031*.

development, setting the foundations for a child's future. The research identified the top four reasons why educators left the sector as poor rate of pay (41%), work stress (34%), developing new skills (26%), and high workload (25%). The supporting qualitative research further indicated that 'poor rate of pay' is the cumulative effect of many unpaid hours of work, constant demands and insufficient staff to deliver a good service. Educators described that feeling physically and emotionally burnt out from working in the sector, coupled with no ability to control their own working environment, left them feeling that leaving the sector was the only option. Research participants suggested that improved pay and higher staff-to-child ratios would entice most educators to return to the sector as well as quarantine non-contact hours allocated for documentation and programming. Overall, improving pay and working conditions, as well as investing in management and leadership skills for service leaders would potentially encourage more people back to the early childhood education.

There is also a role for Be You, the national mental health in education initiative, which provides consultant support to services to strengthen educator wellbeing as well as social and emotional learning outcomes for children. Be You is currently reaching over 6,000 services but there is scope for expansion and for more support to enable participation. ECA is the delivery partner for Be You in the early childhood sector, partnering with headspace and Beyond Blue to deliver the initiative funded by the Department of Health.

Affordability and complexity should not be barriers to ECEC success

Draft recommendation 6.2: Modify the Child Care Subsidy to improve affordability and access

ECA advocates for changes to the Child Care Subsidy (CCS) to improve affordability and access for children and their families to ECEC. It is well-documented that for many families with young children, engagement in work and study is limited by out-of-pocket costs for ECEC. Families should be able to choose what best suits the needs of their child/ren and family circumstances. Families, especially mothers, are often wedged between imperatives of workforce participation and care responsibilities—it is important that we do not mistake current utilisation of ECEC for what families would choose if barriers were addressed. Access to ECEC supports parental participation in the workforce, and this has important economic benefits now and into the future. However, this should not be the primary goal. Rather, high-quality educational outcomes in the early years should be the driver.

At the same time, children's access to high quality ECEC needs to be reframed as their entitlement.[16] These are not mutually exclusive. When looking to the *Alice Springs (Mparntwe) Declaration*, the first goal clearly articulates that, 'the Australian education system promotes excellence and equity.'[17] To exclude children from access and participation in ECEC, particularly due to the Activity Test is clearly not equitable. ECA supports access for every child for to up to 30 hours of subsidised ECEC per week without the Activity Test for every child regardless of where they live and how parents/carers do or do not engage in work, study or volunteering in the community. Providing a subsidy rate of 100% for families with an annual household income at or below $80,000 enables families, particularly women, to make decisions about their workforce participation, without being

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[16] Centre for Policy Development (CPD), *Starting Better. A Guarantee for Young Children and Families* (2021), https://cpd.org.au/wp-content/uploads/2021/11/CPD-Starting-Better-Report.pdf

[17] Council of Australian Governments Education Council, *Alice Springs (Mparntwe) Education Declaration* (2019), http://nla.gov.au/nla.obj-2391375250

disproportionately impacted by costs of accessing ECEC. It also allows children to equitably access ECEC, regardless of household income.

Universal access to ECEC is important for every child and family. It is well-understood the positive impacts to children, but also the opportunity for parents/carers, particularly mothers, to engage in work or study. It is possible to design an ECEC system of provision that recognises the universal benefit for all children, while also taking into account that some children benefit more or require additional support to achieve the same outcome. Known as proportionate universalism, it is similar to the needs-based model of school funding[18]. Every child would receive a baseline level of ECEC provision, and vulnerable children and families would receive extra support to resolve their barriers to access. The system needs to be simple, accessible, and have mechanisms available to families when they face difficulties with the system and subsidy (such as losing CCS due to not meeting activity obligations). Removing punitive approaches and instead supporting families, whether with a 'system navigator' or by better supporting ECEC services to assist the family to secure CCS, will likely increase engagement with ECEC services.

ECA propose that consideration be given to a funding mechanism linked to the age of children and staffing ratios – i.e. where funding is higher for children under 36 months, from 3 years to school age and then school age children. This could replace the current hourly cap based on service type to better reflect the actual costs to ECEC services in meeting the legislated ratios for children and providing high quality education and care for young children. Neuroscience is clear that the first 3 years of a child's life is particularly critical in early brain development and laying down the architecture of the brain[19]. Age-based subsidies would better reflect this incredible opportunity that we have to positively impact children's developmental trajectories and the high level of care of young children required of ECEC services. It would also allow for more flexibility in service types going forward as we see increasing numbers of younger children attending outside school hours programs and blended models of preschool and long day care.

Draft recommendation 6.1: Monitor rises in fees and out-of-pocket expenses

ECA agree that any out-of-pocket expenses should be reasonable and minimal for families. At present, fee schedules can differ between programs, service providers and jurisdictions. As such, it will be important in the establishment of the proposed ECEC Commission that the Government demonstrates a preparedness to work with states and territories about the function of this Commission and provide a level of consistent monitoring. Ongoing stakeholder consultation will ensure that any regulatory response is well-considered and provides meaningful support to families so to allow them to choose from the complementary education and care types throughout the sector.

ECA supports a capped model of out of pocket costs for families from the perspective of simplicity to encourage participation. However, we also understand the risk this carries for service providers if the financing mechanism does not adequately cover the cost of delivery across settings, age groups and service types and over time as costs increase due to wage increases and other cost pressures. A sophisticated co-design process involving service providers and informed by the work of the ACCC on cost drivers and complexities would be required to make this approach feasible at scale. Through any transition to a new financing model it will be important to maintain and

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[18] Susan Pascoe and Deborah Brennan, *Lifting Our Game: Report of the Review to Achieve Educational Excellence in Australian Schools Through Early Childhood Interventions* (2017), http://nla.gov.au/nla.obj-612290923
[19] National Scientific Council on the Developing Child, *The Timing and Quality of Early Experiences Combine to Shape Brain Architecture: Working Paper #5* (2007), http://www.developingchild.net

grow the supply of ECEC, which currently relies on substantial private investment as well as public and not-for-profit sectors.

Draft recommendation 6.3: Make information about CCS eligibility easy to find and understand

ECA supports improved messaging for families about CCS eligibility, enrolment processes and access requirements. Exploring data on who is and who is not accessing current CCS information is essential to inform the design of communication strategies and accompanying information collateral. For families who lack experience navigating government systems and processes, information around CCS can be unfamiliar and difficult to understand. It certainly should not be assumed that all families know and understand CCS-subsidised ECEC and their own eligibility. Better equipping service providers who work with children and families, including those outside the ECEC sector, with clear and consistent messaging will also improve parental understanding of their entitlements. When service providers from other disciplines understand CCS and how families can apply and access the CCS, families are likely to receive consistent advice. This may be particularly important for 'harder to reach' families.

Draft recommendation 6.4: Improve the CCS calculator on the Starting Blocks website

If the Activity Test is retained, then the CCS calculator is a useful tool for families to test their CCS under different scenarios. It is reasonable that the calculator on the Starting Block website be improved and that communications are shared with families about its availability to them and how this can be helpful. ECA's position is however, that the Activity Test be removed or significantly modified and that every child be able to access and participate in ECEC, regardless of the activities of their parents/carers.

Draft recommendation 6.5: Prompt families to update their details with Services Australia

Greater alignment between government departments would seem to be sensible. Where this supports families to access and meet their obligations for CCS, consideration should be given. Again it should be noted that ECA advocates for the removal or simplification of the Activity Test and ECEC made available to every child as their educational entitlement, regardless of the activities of parents/carers.

Draft recommendation 6.6: Provide better information to families about CCS withholding rates

In all instances, ECA supports clear and accessible messaging to families. This includes information about CCS withholding rates, the amount and why this is held and should form part of the application process. Information to families about applying for CCS needs to be simple and clear and not contain unnecessary information. Real world examples may further assist families in understanding how and why the withholding rates operate and minimise confusion.

Draft recommendation 2.2: Amend the Disability Standards for Education

ECA supports changes to the *Disability Standards for Education 2005* (Cth) to be inclusive of all ECEC services that make up the sector, and reflect the complementary education and care types who work with and for children and families in every jurisdiction.

A universal ECEC system has to be inclusive of all children

Draft recommendation 2.3: Amend eligibility requirements for inclusion funding

We would like to see every child receiving the early childhood they deserve. The system needs to be responsive and adaptive to support families where they are at and when they need it.

Australia has great early education and care opportunities for children to participate in, so they thrive and learn today and in the years ahead. However, this is not the case for every child.

Families with children with disability or challenging behaviours often report exclusion from services. The Australian Institute of Family Studies (AIFS) Evaluation of the Child Care Package reported a finding that 20% of families with a child with additional needs had to change services because their children's additional needs could not be met.[20] These families were also more likely to be dissatisfied with the service they received. The evaluation also reported the practices of services not offering places to children with additional needs or operating a quota system—capping the number of children who could attend. The impact on families in lower socio-economic circumstances are also impacted in higher proportions.

The Inclusion Support Program (ISP) has experienced increased demand and pressures, which has impacted upon the services available to support children with additional needs. In the ISP currently, there is a mismatch between funding allocation, service provision costs and the financial support provided for the necessary additional educators through the program. This needs to change so that services are not disadvantaged, or even disincentivised, when they include every child in their community.

ECA supports significant increases to the funding allocated to the Inclusion Support Program, to better reflect the growing number of ECEC services and children requiring support.

Delays in supporting inclusion of children requiring support due to the administrative burden, requirement for a formal diagnosis, and demands on Inclusion Agencies is impacting the capacity of ECEC services to ensure inclusive and responsive practices and environments for every child. Children with additional needs other than disability, such as challenging behaviours or traumatic backgrounds, should be accepted for all ECEC services seeking access to the Inclusion Development Fund Subsidy for an Additional Educator and the Family Day Care Top Up.

The Family Day Care Top Up is underutilised. In part, this is due to the administrative burden placed upon providers to apply, and compounded by the gap between costs of providing services and the Top Up payment amount. Any changes or improvements to the Family Day Care Top Up needs considerable consultation with key stakeholders to consider how children and FDC educators/providers can be better supported by the ISP. For children in FDC with a diagnosis or additional needs without a diagnosis, there is little inclusion support available. The onus falls to FDC educators and providers to ensure FDC settings are inclusive and meet children's needs.

Draft recommendation 2.4: Review and amend additional educator subsidies

The additional educator subsidies are widely seen to be insufficient to cover the cost of a Certificate III or Diploma educator. There is a significant difference between the rate provided through the subsidy and the true cost of an educator. In addition, there are not always educators available to employ.

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[20] Jennifer Anne Baxter and Kelly Hand, *Flexible Child Care: Key Findings from the AIFS Evaluation of the Child Care Flexibility Trials* (Melbourne: Australian Institute of Family Studies, 2016, April), aifs.gov.au

As a longer-term plan is co-developed with key stakeholders to make foundational changes to the ECEC inclusion ecosystem, the provision for additional educators continues to be important and must be funded accordingly. Currently, approved providers who can find suitable staff and fill the role of an additional educator under the ISP, are effectively responsible for supplementing the additional costs to enable the ISP provision. This needs rectifying, and quickly. ECA advocates for the additional educator subsidies to be equivalent to that of a Diploma educator (with indexation applied) to reflect the level of responsibility they carry and to positively impact the setting to promote inclusion. Allied health professionals are scarce across many parts of Australia, particularly for children and families who are living in regional, rural and remote areas. It is highly unlikely that allied health professionals would be available, or choose to engage with the existing additional educator subsidies.

Where additional educators are not available, such as in regional, rural and remote settings, ECA would like the Australian Government to allow ECEC services to apply this additional educator subsidy in other ways. The need for additional services and supports is clearly still evident, and usually when the additional educator subsidies have not been used, this is related to workforce shortages and lack of available qualified educators to support inclusion. ECA is prepared to work with Government to propose and consider different models to support inclusion positively and constructively for these services, without undermining the intent and application of the additional educator subsidies for other ECEC services.

Draft recommendation 2.5: Reduce administrative burden of Inclusion Support Program applications

Applying for funding through the Inclusion Support Program is onerous and ECEC services carry this significant administrative burden. To simplify this process, ECA suggests that it will be important for the Australian Government to work with Inclusion Agencies and other stakeholders to co-design an improved application process. Possible changes to the NQF could see inclusion principles and practice securely embedded within the National Law and Regulations. ECEC services could evidence through the Quality Improvement Plan, as a living document, inclusive practices and the QIP could accompany the application process.

Draft recommendation 2.6: Improve coordination of inclusion funding between governments

Improved coordination of inclusion funding between Australian, state and territory governments is well overdue. As an early action, ECA proposes that governments collaborate on an Inclusion Strategy that informs the re-designed ISP model. This Strategy should ensure it builds the capability of the ECEC workforce and encompasses:

- community engagement
- integrated practice development across sectors and not-for-profits
- professional learning for ECEC educators
- coaching and mentoring to support ECEC educators
- recognition of the unique needs of each jurisdiction and the cohorts of children they serve, using data from the AEDC and SEIFA Index to understand nuanced needs and plan for local supports
- equal support for children presenting with challenging behaviours, trauma backgrounds, experience in the child protection system or family and domestic violence; not only disability

- family-centred and strengths-based practice.

ECA has heard from members who see inconsistencies across the board, such as witnessing one child being able to access support through one program, either federally or state funded, but not another. This is confusing for everyone and counterproductive for the cause of inclusion.

ECA also advocate for improved coordination and alignment of Australian Government funded initiatives more broadly to support universal access and ensure ECECs are inclusive environments. Be You and Inclusion Agencies could be supported to build a collaborative partnership to strengthen the collective impact of the complementary federally funded initiatives.

> *Inclusion promotes belonging, protects the rights of children and young people with developmental delay or disability and fosters the mental health and wellbeing of children and young people of all abilities.*[21]

Inclusive practices in ECEC settings happen by intentional planning and design, and evolve to meet the changing needs of children the learning community. Be You is well placed to work alongside ISPs to provide practical and tailored support to plan and implement whole learning community approaches to grow inclusive environments.

The Draft Early Years Strategy highlights that when policies and programs working in pursuit of common goals, they can achieve outcomes greater than the sum of their parts, and work better in the service of the needs of children, their families and communities.[22]

ECEC services should be flexible and responsive to the needs of families

Draft recommendation 7.1: Ensure integrated services are available where needed

Service integration is logical and cohesive support systems serve to benefit families, ECEC services and other service providers, as well as the wider community. Even for professionals working within the ECEC sector, understanding the different service systems available to families can be challenging. ECEC services are important connectors of families to services, and are often seen as hubs in the community. Where different provider types come together within an integrated model, the burden to families is reduced, and access and availability of supports made easier. Benefits to ECEC services and educators may also become evident when working with, and alongside, allied health and other professionals in the support of families. ECA is keen to participate in Government or facilitate co-led consultation with stakeholders to better map the strengths and gaps in the provision of services to families to inform this integration. Innovative models may include a hub and spoke model that work cross-sector and across provider types, working with and for the communities that they serve (e.g. schools, children's centres, and libraries becoming Early Years Hubs for integrated service provision).

A number of jurisdictions have set up integrated child and family centres which provide a range of services under one site including early learning, family support and health services – creating a supportive environment that assists families with navigating a range of government services and activities to help them achieve strong early childhood development outcomes for their children. These models have similarities to the Multifunctional

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Aboriginal Children's Services (MACS) which have been operating for a very long time. Recent work by Social Ventures Australia has identified the driving and restraining forces on model of integrated services[23]

Draft recommendation 7.2: Support connections between ECEC and child and family services

Mapping of services available to children and families is an important initiative, particularly if integrated service system is to be planned for and delivered to children and families wherever they are. For many families with young children, supported playgroups are a program that offers dual benefit, providing positive experiences for children and families and supporting parents/carers in their role as children's first educators. Playgroups are usually bespoke to meet the needs of their communities and a soft entry point - providing an inclusive and welcoming environment for all. Where collaboration between playgroups, ECEC services and other services exists (such as child and family health for child health checks), the playgroup can become a conduit to access and participation in other settings and protective factors made available to children and their families (i.e. wrap around supports). Research demonstrates that for the approximately one in three children who attend playgroup, there is a positive association with children's development at school commencement across the Australian early Development Census (AEDC) developmental domains.[24] Children's experiences prior to school matter. There are other settings also which children and families access in their communities. Examining connections between ECEC and engagement with child and family services is important, but a significant and complex exercise. An early task of the proposed ECEC Commission could oversee a mapping of these services, supported by state and territory agencies, and local governments, who have closest proximity to children and families and the services which they use and are available to them.

Supporting services to understand and use the AEDC data is also worthwhile. By way of example, the WA Education Department has developed a suite of resources for educators and service leaders (see below), similar work has been done in QLD and SA.

Practice Example: WA AEDC school and ECEC

The Western Australian AEDC school and ECEC engagement kit is a package of resources to assist the school and ECEC sectors to engage with and build a deeper understanding of the AEDC. These resources link with the National Quality Standard, Early Years Learning Framework and the Australian Curriculum, and how the AEDC can be used for evidenced-based and evidence-informed planning within local community contexts. The resources include domain guides, links to key frameworks, other printable resources, and video examples of how schools and ECEC centres have used the data. The Department has developed the resources by working closely with the Telethon Kids Institute, the Association of Independent Schools of Western Australia, Catholic Education Western Australia, the New South Wales Department of Education and the South Australian Department for Education and Child Development. An AEDC online professional learning (OPL) course has also been developed and complements the resources. The course includes four 15 minute online learning modules which can be logged into by government and non-government schools, as well as ECEC centres.

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[23] Tim G. Moore, *Developing Holistic Integrated Early Learning Services for Young Children and Families Experiencing Socio-Economic Vulnerability* (Prepared for Social Ventures Australia. Parkville, Victoria: Centre for Community Child Health, Murdoch Children's Research Institute, The Royal Children's Hospital, 2021), https://doi.org/10.25374/MCRI.14593890 https://www.socialventures.com.au/assets/Holistic-integrated-ELS-MCRI-SVA-full-paper.pdf

[24] Alanna Sincovich, Tess Gregory, Yasmin Harman-Smith and Sally Anne Brinkman, "Exploring associations between playgroup attendance and early childhood development at school entry in Australia: A cross-sectional population-level study," *American Educational Research Journal* 57, no. 2 (2020):475-503, https://doi.org/10.3102/0002831219854369

Draft recommendation 7.3: Introduce a higher hourly rate cap for non-standard hours

ECA recommends that provision for non-standard hours in ECEC should align with the additional operating costs that providers face. Providers of non-standard hours are often Family Day Care providers and educators responding to the needs of the families of children who attend their service. ECEC providers should not be expected to absorb additional costs when offering non-standard hours, which in turn can enable the participation of families, particularly mothers, in employment, study and training.

Draft recommendation 7.4: Examine planning restrictions related to operating hours

Planning requirements and restrictions differ depending on state, territory and local governments. It seems reasonable that consideration be given to not unreasonably restrict ECEC services from operating in non-standard hours in response to community need.

Draft recommendation 7.5: Ensure occasional care is available where needed

Occasional Care as an out-of-scope service is often employed by communities unable to establish a regulated ECEC service. These are often found in smaller communities (unserved or underserved) where there is a demand but not one that supports a viable standalone service, or one which may be attractive to a third-party provider. ECA argue that all ECEC services should, under the reviewed NQF, be regulated services, funded, compliant and of a high-quality. For CCCF services, there is a need here for Government to work with community to hear their voices and to consider ways in which a revised NQF can acknowledge knowledge and ways of knowing and being[25], whilst confidently providing ECEC services to children and families which are compliant and quality. ECA suggests that thinking differently around what quality looks and sounds like in remote settings and how this can still reflect a revised NQF with support from ECA or other like-minded organisations to build capacity, support governance and operations, but at all times, work **with** community.

Draft recommendation 7.6: Support out of preschool hours ECEC

For families accessing dedicated preschools, the choice of accessing out of preschool hours ECEC would likely be welcome. The hours of a standard preschool day can prove challenging for parents/carers engaged in work and study. This may impact decisions which parents/carers make around how children may or may not access their preschool entitlement. With any piloting of out of preschool hours ECEC for dedicated preschool, consideration should also be given to impacts on other ECEC services that apply the CCS. In any case, before and after school care provision to preschool-aged children should be provided in a coordinated way to reduce fragmentation of a child's day and minimise burden to families. The South Australian Government has just announced a pilot of 20 preschool sites who will provide out of hours care. The learnings from this pilot will be valuable for other state and territory governments about the applicability of this initiative to their own contexts.

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[25] Tyson Yunkaporta and Melissa Kirby, "Yarning up Aboriginal pedagogies: A dialogue about eight Aboriginal ways of learning," in *Two Way Teaching and Learning: Toward Culturally Reflective and Relevant Education*, ed. Nola Purdie, Gina Milgate and Hannah Rachel Bell, (Melbourne: ACER Press, 2011), 205-213, http://research.acer.edu.au/indigenous_education/38/

Draft recommendation 8.1: State and territory regulatory authorities should improve their performance reporting

ECA supports improvements to performance reporting by state and territory regulators. Similar to ACECQA's (2023) *NQF Annual Performance Report:-National Quality Framework*,[26] the reporting of progress and accompanying metrics would be helpful to stakeholders in the ECEC sector, and likely improve the transparency and accountability of approved providers and also state and territory regulatory authorities. Improved and consistent performance reporting would allow for greater transparency of how the National Law and Regulations are applied in different jurisdictions, particularly through the process of Assessment and Rating where differences may be found depending on where services are located. Ideally, ECA would like ongoing engagement between state and territory regulatory authorities, approved providers and ECEC services to build trust and relationships and improve the quality of practice to positively impact children and families.

Quality is paramount to achieving the benefits of ECEC

Draft recommendation 8.3: Ensure regulatory authorities are adequately resourced

State and territory regulatory authorities perform an important role in ensuring compliance and quality within the ECEC sector. The volume of work and activities which regulatory authorities are responsible for continues to increase. Backlogs of ECEC services which have not been assessed and rated in the last five years of longer, have been noted. In the interim, state and territory regulators may perform monitoring visits and other activities, such as providing briefings, advice, and the self-assessment tool for services to complete.

With increasing numbers of services across all jurisdictions and the complexity of the ECEC sector and the need for deep engagement between the regulatory authorities and ECEC services, it is clear that the regulatory authorities need to be resourced accordingly to support ECEC services to engage with embedded quality improvement processes, such as effective use of the Quality Improvement Plan (QIP) to articulate and drive service improvement. ECA would argue that regular engagement with the state and territory regulatory authorities is more likely to see improved, embedded and sustained genuine practice change, than irregular Assessment and Rating. ECA would welcome the opportunity to co-lead or participate in processes to develop alternative models to ensure a robust, engaged and timely system to promote embedded and sustained practices every day.

Draft recommendation 8.4: Incentivise quality provision in new ECEC services

ECA support state and territory regulatory authorities considering the performance of existing ECEC services when making decisions of new services from that provider. However, ECA would like to see mechanisms which acknowledge what may be complex settings, and support made available to providers to improve their compliance and quality. Not every ECEC service belongs to a larger provider, and as such may lack in supports to embed and sustain practices reflecting high quality (e.g. lack of policy support, pedagogical coaching, strategic planning). If the focus moves to the entitlement of every child to high quality ECEC experiences, then providing greater supports where needed to move ECEC services from Working Towards NQS to Meeting the NQS and beyond, will be important. This may look like greater input from ACECQA for consistency, or from state and territory regulatory

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[26] Australian Children's Education and Care Quality Authority (ACECQA), National Quality Framework Annual Performance Report (Sydney: ACECQA, 2023).

authorities themselves (e.g. approved policy templates) to clearly demonstrate what is required and to enable services to contextualise as needed.

Draft recommendation 8.2: A new review of the National Quality Framework

ECA acknowledges the substantial and positive impact of the NQF on the provision of services to children in Australia. The NQF was expertly crafted, drawing on both research evidence and practice wisdom, it supported the development of a shared knowledge base and professional language in a sector that had been previously undervalued and poorly understood. We should take national pride in the NQF and what has been achieved over the past decade in lifting the quality of early childhood services and raising the professional standing of early childhood educators and teachers.

Nonetheless, more than a decade on from the NQF's development it is time to evolve the framework and ensure it supports positive outcomes across diverse settings. It is important that the NQF adapt to changing technology and practice to ensure it remains fit for purpose and effective as a mechanism for supporting quality improvement across all ECEC services. Consideration of how the NQF can be culturally responsive, concentrate on educator and child wellbeing and mental health, and better reflect the diversity of settings is important to ensure that an inclusive lens is applied. All the while, children's safety, learning, and development should remain central. The work of currently out-of-scope, remote CCCF-funded ECEC services is one such example. Considering how the NQF makes sense in different contexts is important if it is to live up to its promise.

ECA believes that the rating and assessment process needs to be more of a rolling or continuous process rather than a discrete event; also that progressive regulation can support quality improvement through knowledge sharing and advice. An increasing proportion of ECEC operators have more than one service and some elements of quality could be assessed at the provider level (e.g. policies and protocols), while other elements (program responsiveness) are more appropriately assessed at the service level.

Draft recommendation 2.1: Ensure appropriate quality regulation for services outside the scope of the National Quality Framework

Under current legislation not all ECEC providers are covered by the NQF. These 'out of scope' services include some occasional care providers. The early childhood profession can only come together when there is shared understanding, language and commitment to the NQF. ECA supports quality regulation for services outside the scope of the NQF. With growing numbers of out-of-scope services responding to the needs of communities which may not be serviced by other ECEC services, it is important that children enrolled in these services access safe, culturally-responsive and quality settings which are monitored by the regulator. ECA supports a review of regulatory arrangements for out-of-scope services to close this loop and address inconsistencies. Resourcing and increasing the effectiveness of the regulator in each state and territory is important to ensure that monitoring and Assessment and Rating across all jurisdictions is timely and effective. Exploring the efforts of currently out-of-scope, remote CCCF-funded ECEC services could be a worthy place to start this work.

Draft recommendation: Improve policy coordination and implementation [Draft recommendation 9.1]

Clarification or roles and responsibilities between all governments through a National Partnership Agreement for ECEC would be welcome. The Australian Government continuing to have oversight over early childhood policies and associated funding responsibilities (and funding of outside school hours care). However, the continuing responsibility of state and territory governments for preschool and transition into school does perpetuate significant inconsistencies in the delivery of children's educational entitlement in the year before school. Building on the Preschool Reform Agreement, ECA proposes that the National Partnership Agreement examine disparities in the delivery of preschool provision in the year before school and strategically map steps towards greater consistency for every child.

At present, a child may attend both a state-funded preschool and a separate or adjoined ECEC service funded by the Federal Government and that "*there is little sense of shared responsibility for…learning*"[27] between the services. Both sectors expect additional parent contributions.

ECA recommends that all children have accessibility to wraparound supports when enrolled in approved preschool programs, regardless of whether the children attend a dedicated preschool or an approved preschool program in a Long Day Care (LDC) setting. Complexities with governance and funding should not create artificial barriers in whether children can access allied health and other supports. Greater consistency is owed to children enrolled and attending preschool programs in different contexts and different jurisdictions. Clarification of roles and responsibilities between all governments through a National Partnership Agreement for ECEC would be welcomed.

Ideally governance and funding of all ECEC services should be intuitive and responsive to the needs of children and families, and significant inconsistencies between services, systems, and jurisdictions need to be urgently resolved. ECA is well-positioned to advise and consult through this process and to support all governments to align ECEC policy, program delivery and funding models more cohesively.

Draft recommendation 9.2: Establish an ECEC Commission

ECA is supportive of the stewardship of reforms and initiatives in ECEC, and the establishment of an ECEC Commission with the powers, remit and funding to affect change and drive a shared reform agenda. The ECEC sector is highly complex and changes to the eco-system must be carefully and intentionally rolled out, removing replication and inconsistency and building on the strengths of the complementary education and care types which make up the ECEC system. If well planned, the ECEC Commission has the potential to support greater alignment between Commonwealth and state and territory ECEC delivery and funding. ECA sees an important role also for Local Government who know their local areas best, grassroots providers working with children and families, and the community itself including families and children.

ECA see a potential way forward for the Australian Government to expand the powers, remit and funding of ACECQA to serve as the ECEC Commission. ACECQA as an existing entity, if given regulatory authority and appropriate resourcing, could serve this role, instead of the introduction of an additional body to an already highly complex ECEC system. Notwithstanding this, whoever takes this role in the ECEC Commission should commit to

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[27] Centre for Policy Development (CPD), *A New ECEC System for Australia. Draft for Input* [Unpublished], 2.

ongoing consultation with state and territory leaders in how that commission can best operate and function as the steward of the ECEC system.

Response to information requests

Information request 2.1: Suitability of the National Quality Framework for Outside School Hours Care

Since the NQF was introduced, the world has changed, and the role of Outside School Hours Care (OSHC) has expanded. It seems that the NQF, in its current form, does not adequately support or promote quality in OSHC settings, ECA suggest that more contextualisation of the NQF is needed for OSHC services, whilst being sure to keep and maintain elements which have been effective. OSHC as a recreation, health and wellbeing program is positioned differently from ECEC, and ongoing consultation with the OSHC sector including peak bodies such as the National Outside School Hours Care Alliance (NOSHA) is important to better enable this different care environment with its specific attributes.

Engagement with the OSHC sector is important to better understand the specific needs of OSHC services. ECA suggests that within the NQF, there should be greater flexibility for OSHC services to evidence quality within the OSHC setting, and that resources interpreting quality in OSHC would assist providers to meet requirements. Additionally, OSHC services need the remit, afforded through legislation changes, to operate under the National Law and Regulations with greater agency to treat groups of children as cohorts instead of as individuals.

The planned review of the assessment and rating methodology for OSHC will explore this further, although the priority of this commitment within the current reform agenda is unclear. For OSHC services, the current assessment and rating system is unnecessarily burdensome. Without undermining quality in the OSHC sector, an example of different positioning for OSHC under the NQF could look like a more regulatory approach for assessment and rating where OSHC services evidence that they have met or not met the National Quality Standard. Excellent could be a rating which services could apply to ACECQA, as currently. ECA suggests again that ideally statutory authorities would have an ongoing relationships with OSHC services, building quality and capacity.

It is also acknowledged that children attending OSHC services are owed a greater sense of agency due to their ages and stages of development. Increased clarity about what supervision looks like within an OSHC service and how it can be achieved while also ensuring a level of independence may be valuable.

Consideration should also be given to how OSHC service provision, and regulation, needs to adapt to changing policy settings. For example, considering the Commission's draft recommendation to give all children an entitlement up to 30 hours or 3 days per week of subsidised care, and considering announcements in regard to 3-year-old preschool by state and territories, demand for OSHC service provision could increase for young cohorts which require different regulatory considerations under the NQF.

The Government acknowledging the importance of the current role of the OSHC sector could better enable OSHC to provide a multi-disciplinary health and wellbeing hub in every school site, supporting children's transition between home and school, children's citizenship and agency, and the foundations of lifelong learning and wellbeing. *My Time, Our Place: Framework for School Age Care in Australia* (MTOP V2.0) acknowledges the

importance of play and leisure in children's lives.[28] Complementary guidance in the way of an Educators' Guide and illustrations of practice are needed to accompany MTOP V2.0 to reflect contemporary Australia and the way in which OSHC works holistically with children. Collaborative partnerships between home, school and the OSHC services which children attend are important.[29]

Consideration for the different contexts of OSHC delivery need to be reflected in the NQF. For some children and families, centre-based OSHC may not be the best fit, and instead the FDC OSHC model may be preferable with lower numbers of children in a home-like setting. Preschool OSHC also requires greater consideration about where this fits within the NQF and what this may look like as a stand-alone preschool OSHC service and as integrated within a school OSHC model; each with their own context and characteristics. Outreach OSHC services also perform an important function in allowing children who may otherwise not have the opportunity to attend OSHC and for parents and carers to engage in employment, study and/or training. Many OSHC services share spaces with other programs and in large services to meet the regulations, often multiple spaces within a site make up the licenced premises. Elevating the status of OSHC is important and reflecting its difference through the NQF is one way in which this could be achieved. Supply-side funding to support infrastructure development of OSHC hubs or precincts makes good sense; that to establish quality dedicated purposeful spaces for OSHC is likely to support daily transitions, supervision, relationships and the OSHC program more generally.

By way of an example, insight from Early Childhood Australia Northern Territory (ECA NT) body, in its role as the Northern Territory Inclusion Agency (NT-IA), is presented. It is evident that the sector is able to meet the NQS, albeit at a lower quality rating on average than other service types. This possibly could be attributed to the workforce differences in OSHC settings in comparison to other settings such as qualifications and experience.

As at 11 December 2023, there are 55 OSHC services in the NT, 11 of those are operated by NT Government school councils. In consideration of the Commission's draft recommendation that all primary schools should ensure an OSHC service is available if demand exists, the development of operational guidance will be needed to support schools with the provision of a regulated OSHC service. This would be particularly beneficial for school council operated OSHC services given representatives generally comprise of parent volunteers who may not necessarily have the business acumen to operate a viable and compliant service, which may in turn place additional burden on school principals.

Information request 2.2: Cultural safety in ECEC services

ECEC services should always be culturally safe places for children, families and educators. ECA believes that the NQF would be strengthened by adopting a clearer imperative of Aboriginal and Torres Strait Islander cultural responsiveness and capability as well as articulating the importance of cultural diversity and inclusion for children from culturally and linguistically diverse families and communities. This would provide stronger guidance to services to respond and embed cultural safety as part of their everyday practice. The use of the Quality Improvement Plan (QIP) as a driver to ensure that commitments to cultural safety and capability within the ECEC setting are not merely captured on paper, but embedded within an iterative and agile program which promotes quality improvement in a clear, systematic way across the ECEC service. ECA would strongly encourage

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[28] Australian Government Department of Education (AGDE), *My Time, Our Place: Framework for School Age Care in Australia (V2.0)* (Canberra: Australian Government Department of Education for the Ministerial Council, 2022).

[29] Jennifer Cartmel and Bruce Hurst, *More Than 'Just Convenient Care': What the Research Tells Us About Equitable Access to Outside School Hours Care* (Brisbane: New South Wales Department of Education & Griffith University, 2021, June), https://education.nsw.gov.au/content/dam/main-education/early-childhood-education/information-for-parents-and-carers/OSHC_More_than_just_convenient_care_policy_literature_review.PDF

consultation with Aboriginal and Torres Strait Islander peoples, and organisations such as SNAICC who already provide considered advice and guidance to the sector in cultural safety.

ECA has already argued that fundamental changes are needed to the inclusion eco-system. Cultural safety needs to be visible in real ways in every ECEC services, and fully embedded and sustained. Unpacking the experiences of cohorts of children, families and educators is needed to hear and amplify the voices of Aboriginal and Torres Strait Islander, and CALD children and families. Many services are likely doing great things in regard to cultural inclusivity, yet still the experience of some children and families may not feel culturally safe. Reflective practice is an essential element of quality teaching. Enabling ECEC services and both pre-service and existing ECEC educators, through adequate planning time, intentional professional learning opportunities, and necessary resourcing, to build their capacity to engage with families, embed cultural safety and capability cannot be left to chance. ECA's Be You Culturally Responsive resources[30] is highlighted as an example of supportive, evidence-informed and co-designed professional learning in this area. The work of the educator in understanding their role in working to establish and nurture cultural safety is an important aspect, with mental health and wellbeing of children and families understood as important protective factors.

Recent updates to the approved learning frameworks which strengthen Aboriginal and Torres Strait Islander perspectives and cultural responsiveness, but an evolution of the NQF could further embed the principles of inclusion and cultural safety.

Early Childhood Australia Northern Territory (ECA NT) works closely with ECEC services across the Northern Territory. The NT population is culturally diverse, with around 20% of its residents born overseas[31] and an Aboriginal population of 30.8%.[32] Culture and family are inextricably linked and may influence the attitudes, beliefs, feelings and behaviour towards the education and care for children from different culturally and linguistically diverse backgrounds.

While culturally and linguistically diverse families in urban settings may have greater access to an ECEC service, the administrative aspects of enrolling and participating in a service may be daunting, particularly given language and comprehension barriers. Different cultures also have different understanding on the benefits of ECEC for their children's development.

To this end, it may be of benefit to develop more resources in first languages to reach and support families with understanding the importance of quality ECEC and how to access these services. In the NT, the Family as First Teachers (FaFT) program, Connected Beginnings program and Child and Family Centres (CFC) act as connectors to engage families and communities with quality ECEC programs, assist them to navigate the local service system, and build parents' capacity to give their children the best start in life.

Services are often surrounded by concentrations of culturally and linguistically diverse families and communities. Improving the engagement of non-government service provider's with large-scale data sets, such as the Australian Early Development Census, could provide an opportunity for educators and providers to better understand the

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[30] Be You, *Culturally Respectful Engagement for Learning Communities* (2024), https://beyou.edu.au/resources/culturally-respectful-engagement-for-learning-communities?gclid=EAIaIQobChMIw5yKvdi4hAMV2219Ch1DIwKuEAAYASAAEgLPC_D_BwE

[31] Northern Territory Government, *Multicultural Policy for the Northern Territory 2020-2025* (2020), https://apo.org.au/sites/default/files/resource-files/2020-06/apo-nid306379.pdf

[32] Department of Treasury and Finance, *Fast Facts. Population. Northern Territory Economy* (Darwin: Northern Territory Government, 2024), https://nteconomy.nt.gov.au/fast-facts/population

diversity that exists within their local community and consider the approach needed to support better inclusion and cultural capability relative to the needs of a service.

Information request 2.3: Functioning of the Inclusion Support Program in family day care

The Family Day Care Top Up is under-utilised and reflects a need for review. For Family Day Care (FDC) providers and educators, there is little incentive to apply for the FDC Top Up which does not cover costs and provides no additional inclusion support to positively impact practice. FDC provides an important service to many children and families, and is a key part of the diverse early childhood service map.

ECA encourages Australian Governments to engage with families who use or would likely use Family Day Care, and FDC providers and educators to understand their bespoke needs. Local governments are often positioned with knowledge and reach to map what is available within their communities, and the experiences of families and children. Working with peak bodies such as Family Day Care Australia, ECA and others, innovative modelling in areas of need could be undertaken to consider how best to serve communities, and to better support the inclusive practice of FDC providers and educators. This may be through models such as in-venue care where other education and care types are not present and viable. The ISP in FDC settings needs close examination for more impactful and supportive measures which genuinely support providers to embed and sustain inclusive practice, without increasing workload for FDC educators who already carry a significant administrative and operational burden.

Information request 2.4: Transition to school statements

At present, transition to school statements are as varied as the prior to school and school settings themselves. The Organisation for Economic Cooperation and Development (OECD) recommend a unified approach to learning in both the early childhood education and the primary school systems, and that consideration should be paid to the challenges faced by young children as they transition to school.[33] While policy reforms of the last 10–15 years, such as the NQF, have aimed to strengthen linkages between education-focused and care-focused services, more needs to be done to ensure integration for children moving between preschool and school.

Many transition to school statements reflect the philosophy of the ECEC service and educator knowledge, with informative statements also demonstrating a holistic understanding of the child. Some focus on school preparedness and seek to include what the ECEC service understand to be relevant to the school setting. Some consistency may be worth considering, but perhaps of most importance is that information is communicated and bi-directional between ECEC and school settings. At present, the communication of transition to school statements from the ECEC service to the school, can be somewhat ad hoc and left to parents/carers. Wherever possible, it is important for the ECEC service to know where children will enrol and attend the early years of school, and similarly for school settings to know and understand the context of the settings where children will come from. For many children and families, the move to school is a significant rite of passage not just for the child, but also the parent/carer and family. Where there is a disconnect between prior to school and school settings, it is often children and families who are required to make the largest leap. Research also reinforces the need for smooth

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[33] Organisation for Economic Co-operation and Development (OECD), *Starting Strong II: Early Childhood and Care* (OECD, 2019), http://www.oecd.org/education/school/startingstrongiiearlychildhoodeducationandcare.htm

transitioning from preschool to school, and that it relies upon the effective transfer of information and deliberate efforts by schools to build upon a solid early childhood foundation.[34]

ECA as a peak body for ECEC, and across the transition to school, into the early years (birth to eight), is prepared to engage with Australian governments and other stakeholders to support the co-design of useful, evidence-based guidance for ECEC and school settings for successful transitions for children and families, including the use of transition statements. An example of this work can be found in the Be You materials where positive transitions for children and families are understood to play an important role in mental health and wellbeing.[35]

Practice Example: NT Transition to School

The NT Department of Education is exploring different avenues to better support transition to school. The transient nature of the NT's population presents greater interstate mobility than any other jurisdiction, with an interstate migration rate of approximately 16% per annum, compared to approximately 3% to 6% across other states. The NT also experiences highly volatile intra-territory mobility patterns, particularly for Aboriginal families. This presents substantial challenges on education delivery and children's learning and has a flow on impact on enrolment and attendance rates in both urban and remote services. Keeping up with children's movements and administration of duplicate records across multiple services can impact an effective transition process. In partnership with the University of Melbourne, the Department undertook a comprehensive research project, working with education system and school leaders to co-design and develop a continuity of learning framework to guide delivery of continuous learning experiences for every child in the NT .[36] In 2024, the department will continue to trial and refine this framework. The Department also has an existing Early Childhood Transitioning to School[37] resource package to support children's transitions to and from preschool. While these documents are centrally located and are publicly available, it is difficult to ascertain the extent of its use as this is not currently measured. Although, based on NT services assessment against the National Quality Standard, 100% of services are meeting or exceeding element 6.2.1: Transitions, which requires services to demonstrate the continuity of learning and transitions for each child are supported by sharing information and clarifying responsibilities.

Information request 3.1: ECEC-related vocational education and training

The ECEC workforce often works beyond capacity, as reflected in numerous consultation and review processes. It follows that vocational education and training providers in the ECEC sector face difficulties providing students adequate opportunity to engage in practicum placements that offer modelling of quality practice. In essence, to be it, you need to first to recognise, see it in practice and be supported to understand what it is and how to get there, with the mentor as a guide. With many ECEC service operating with waivers to be compliant, with ECEC leadership often covering staffing gaps 'on the floor' across their services, and early childhood teachers and educators working with increasingly diverse and complex cohorts of children, for the mentorship needed to grow and

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[34] Susan Pascoe and Deborah Brennan, *Lifting Our Game: Report of the Review to Achieve Educational Excellence in Australian Schools Through Early Childhood Interventions*.

[35] Be You, *Transition From Early Learning Settings to Primary School* (2022) https://beyou.edu.au/fact-sheets/development/transition-from-early-learning-to-primary

[36] Department of Education, *Department of Education 2022-2023. Annual Report.* (Darwin: Northern Territory Government, 2023), https://education.nt.gov.au/__data/assets/pdf_file/0005/1290749/doe-annual-report-2022-2023.PDF

[37] Department of Education, *Early Childhood Transitioning to School.* (Darwin: Northern Territory Government, 2024), https://education.nt.gov.au/support-for-teachers/transitioning-package

develop upcoming educators, it is not hard to questions where this capacity in ECEC services can be found. Government-supported financial incentives for ECEC services who first take on ECEC vocational and education students and who commit to working with them throughout their placement for its duration would demonstrate value on the knowledge and the expertise of ECEC leaders and educators and their important role in growing the profession, whilst acknowledging the additional load that this places on an already stretched workforce and offsets the time necessary to establish a high quality, supported and sustained pipeline of graduate educators. Resilience within the graduate workforce requires educators to have an evidence informed understanding of educator wellbeing, including stressors and stress behaviours, including how best to reflect upon and put in place strategies which can be evaluated for their effectiveness through critical reflection

A number of state and territory governments are investing in scholarship and support programs to increase the uptake of ECEC qualifications (including VIC, NSW, QLD, NT) particularly in rural and remote locations or amongst diverse learner communities. It is difficult to ascertain whether this increase in enrolments is translating to more qualified educators working within the sector given the lack of completion data. While the National Centre for Vocational Education Research (NCVER) publishes data on completion rates, the data has been based on projections since 2019. Non-completion rates in ECEC study are very high and there is potential benefit in ensuring that those who enrol in courses are well suited to the work. The Good Fit Tool (example below) is one approach to improving this.

Practice Example: Good Fit Tool
The Good *Fit Tool*[38] (eysac.com.au/good-fit-tool) developed by ECA Tasmania Branch is an example of a recruitment device which also seeks to pose some questions of potential ECEC students to provoke their thinking about their interest and suitability for engaging in ECEC related vocational training and education. There are twelve statements that describe areas that are important for working in the education and care sector. Respondents are invited to read each statement carefully and think about how they prefer to act, how they spend your time, what they are good at, and what brings them satisfaction. Select the response that is the best fit for you: Sounds a lot like me, Sounds like me, Not sure if this sounds like me, Sounds different to me, or Sounds a lot different to me.

Although Fee Free TAFE relieves the burden of course fees, it does not consider the inequity of remote access to qualifications. Currently, many ECEC educators living and working in remote and very remote locations can only access and participate in mandatory training, and professional development (including practicum placements) by travelling to Darwin or Alice Springs for extended periods and multiple times over the duration of their course. In addition, the need to travel for study can require small services to close during this time as it cannot maintain an adequate level of staffing.

Educators' travel requirements can also be affected by family and cultural commitments and health implications which can in turn affect an educator's availability and engagement in completing the qualification. At the time of this submission there are currently 8 unregulated Community Child Care Fund Restricted (CCCFR) services closed across remote communities in the NT, with 4 of these being long term closures due to a lack of qualified staff

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[38] Early Childhood Australia Tasmania Branch, *The Right Fit for the Job Tool. Early Years and School Age Care (EYSAC)* (n.d.), https://eysac.com.au/are-you-in-the-right-place/

available to open them. This is envisaged to be a barrier for unregulated CCCFR services when building capacity to successfully transition into a regulatory framework should the opportunity arise in the future.

An NT strategy to alleviate the cost burden of delivering training in remote and very remote locations and promote remote Vocational Education and Training (VET) delivery, is to pay NT registered training organisations (RTOs) an additional 80% on top of the standard Annual Hours Curriculum (AHC) rate. While this funding goes some way to assist RTOs to deliver in remote and very remote locations, small enrolment numbers coupled with travel and accommodation expenses, and the additional support and course content adaptation requirements for delivering to participants who speak English as an additional or dialect and have completely different cultural context, continue to make this provision fiscally challenging.

With regards to the recognition of prior learning and experience, some remote ECEC services have reported a lack of recognition within the current approved qualifications and from RTOs for the extensive cultural knowledge and experience that Aboriginal educators bring to the education and care of children. Better recognition of Aboriginal educators' cultural knowledge and experience in local child rearing practices can contribute to better outcomes in ECEC qualification completions. This is consistent with recommendations in the Early Childhood Care and Development Sector Strengthening Plan[39] and the Commission's draft recommendation 3.5.

NT service providers and stakeholders have reported the following regarding ECEC VET courses:

- Some of the assessment conditions are outdated and no longer align with current ECEC practices.
- There is concern the Certificate III qualification is pitched at a higher Australian Qualification Framework level compared with other Certificate III level qualifications.
- Due to burnout within the workplace, there is opportunity to consider a dedicated mentoring program to better support students on practicum.
- Access to a tutoring program/community of practice for students in remote locations could help increase the number of students completing their qualifications.
- Reintroduce the direct entry into the ECEC diploma course.
- Consider incentive for ECEC leaders to undertake a training and assessment qualification to help increase the number of available trainers and promote a career pathway for experienced and qualified leaders to stay connected to the sector.

Information request 3.2: Effectiveness of traineeships

Trainees often carry responsibilities beyond their training and limited experience, and caution is necessary to ensure that trainees have the right conditions and monitoring to develop into skilled educators. Trainees juggle competing demands of work and study and their employment is dependent upon their capacity to progress both simultaneously. Wrap around supports for trainees which intentionally incorporate mental and physical wellbeing are likely to address attrition, but understanding the different needs of school-based trainees and job changers is important. What quality supports look like, how these are made available, and by whom requires consideration; ideally support for trainees would look like the co-responsibility of Registered Training Organisations (RTOs) and the ECEC services where trainees are employed. The effectiveness of ECEC traineeships depend on various factors such as the quality of the program, the support provided to trainees including working above ratio for an initial period (such as 3 months), the curriculum, the expertise of mentors and supervisors, recognition of prior learning

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[39] Department of Education, Department of Social Services, & National Indigenous Australians Agency, *Sector Strengthening Plan: Early Childhood Care and Development* (2021), https://www.closingthegap.gov.au/sites/default/files/2021-12/sector-strengthening-plan-early-childhood-care-development.pdf

and the practical learning experiences being offered. Ensuring training and qualifications are culturally appropriate, particularly for remote Aboriginal educators, will assist with growing a sustainable local workforce.

Information request 3.3: Falling completion rates for early childhood teaching qualifications

Several factors contribute to the decline in completion rates for early childhood teacher qualifications, including:

- financial challenges
- work-life balance
- limited accessibility to programs
- complexity and rigor of coursework
- lack of support and mentorship.

Other industrial factors such as pay, recruitment, training and conditions of employment also contribute to shifting career preferences or pursuing other opportunities that are more attainable. While key actions under the *Shaping Our Future National Children's Education and Care Workforce Strategy*[40] have been accelerated to help address the complex and longstanding workforce challenges experienced by the sector, this is a long-term strategy which will not relieve workforce pressures for the sector in the short term.

The requirement to complete four years of tertiary study to become an early childhood teacher, including an accredited teacher education program at a recognised university or higher education institution can be challenging, and even more so for educators in a remote context. Insufficient guidance, mentorship or academic support within education programs can contribute to feelings of isolation or inadequacy. Balancing coursework, practical experiences and personal obligations can be overwhelming, resulting in higher incompletion rates.

Ironically, workforce shortages also attribute to completion rates as educators may not be well supported to undertake training due to operational requirements. In terms of centre-based day care where many are small business operators, not having a staff member present while they are undertaking coursework can create additional challenges with operating a quality service.

Information request 5.1: Low rates of expansion among not-for-profit providers

Not-for-profit providers face many challenges in the ECEC sector, including:

- limited and insufficient funds that impact on operating a quality service such as maintaining quality facilities, hiring qualified staff, offering competitive wages to educators, staff development and providing adequate learning materials
- comparative differences with for-profit providers regarding access to adequate administrative support and marketing capabilities
- regulatory compliance costs associated with meeting regulatory standards
- limited ability to scale up operations due to financial, resource and infrastructure constraints

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[40] Education Services Australia, *'Shaping our Future' A Ten-Year Strategy to Ensure a Sustainable, High-Quality Children's Education and Care Workforce 2022–2031*.

- reliance on community support and fundraising efforts to sustain operations, which affects long-term viability of the service.

The Australian Competition and Consumer Commission's (ACCC) childcare inquiry 2023[41] found that while the cost to supply centre-based day care is similar for both for-profit and not-for-profit providers, costs are distributed differently. Not-for-profit providers incur substantially higher labour costs associated with a higher tendency to pay above award wage and greater use of full-time staff to minimise employee turnover and vacancy rates.

One of the challenges for not for profits is limited access to capital. Not-for-profit boards are directly liable for losses and therefore risk averse, there are also other challenges with borrowing money for capital projects. ECA has suggested the use of no-interest or low-interest loans to improve access to capital, similar to the Aged Care Capital Assistance Program provided below.

Practice Example: Aged Care Capital Assistance Program (ACCAP)

The Aged Care Capital Assistance Program (ACCAP) provides grants to build, extend, or upgrade aged care services or to build staff accommodation where older Australians have limited or no access. The program aims to maintain or increase access to quality aged care services in thin market settings for people:

- from First Nations communities
- living in regional, rural, and remote areas
- who are homeless, or at risk of becoming homeless
- with other complex and diverse needs, including dementia.

Information request 5.2: Planning processes and availability of ECEC

Greater insight into how and where ECEC services are needed and established would benefit the sector and families. Early Children Australia puts forward that local governments know their communities, working at grassroots with community, non-government and government organisations and hold important place-based, context-specific knowledge. However, this not solely be solely the responsibility of local governments or the statutory regulatory authorities. Rather, a coordinated and shared responsibility between local, state and territory governments and regulatory bodies, supported and overseen by the Commonwealth through the proposed ECEC Commission, is the recommended best approach.

The reference of the ACCC Report on *unserved, underserved* and *adequately served* children, families and communities (referenced in the ACCC Report as 'markets')[42], has provided a useful lens to consider the planning and establishment of new services and the support of existing complementary services within the ECEC sector. Greater guidance and consistency for existing and new providers who are planning and developing ECEC services would address challenges they face when establishing new or expanding services for unserved and underserved cohorts and communities.

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[41] ACCC, *Childcare Inquiry. Final Report December 2023.*
[42] ACCC, *Childcare Inquiry. Final Report December 2023.*

Information request 6.1: Potential modifications to the activity test

One of the major barriers for families accessing the Child Care Subsidy (CCS) is the Activity Test. To this end, ECA recommends the timely and complete removal of, or significant modification to, the Activity Test. Children's entitlement to high quality ECEC should not be dependent upon the activities of their parents/carers.

ECA supports the recommendation of the Productivity Commission and others to relax the Activity Test to allow all families to access up to 30 hours of subsidised care a week (60 hours per fortnight) regardless of activity, providing a step towards universal access. While these changes could be introduced in time, ECA's position is that a swift and responsive roll out is needed to immediately reduce the burden on families and support children to access ECEC provision.

ECA commends the government's earlier decision to increase the Child Care Subsidy (CCS) rate through the Family Assistance Legislation Amendment Bill 2022 to deliver more affordable ECEC. ECA is also supportive of the longer-term aim of implementing a 90% universal subsidy system, which the Productivity Commission is currently exploring. ECA recognises these as important first steps towards longer-term change to ensure universal access to ECEC.

The cost of accessing ECEC presents a significant challenge for families—the cost is estimated to be 23% of a couple's average wage[43]. The most common 'childcare service-related reason' families gave for not being in the labour force was the cost of 'childcare' (26.7%).[44] Of greatest concern is that disadvantaged families remain over-represented in groups with eligibility to fewer hours of subsidised ECEC (24 and 36 hours per fortnight).[45]

The benefits of an increased Child Care Subsidy will only be realised if it is simplified and combined with an equity measure to ensure we do not exacerbate disadvantage and continue to lock out the families with tenuous or unstable work. ECA has previously developed an Equity Measure Proposal to amend the Activity Test and provided this to Government.

ECA would be prepared to engage with Government around the phased removal of the Activity Test, with a focus on delivery to lower income families first. While supply would likely adjust to the removal of the Activity Test for all families, ECA puts forward the view that a more coordinated approach to what and where ECEC is made available, and that powers, remit and funding of the proposed ECEC Commission could see the Commission take a more sustained role moving forward.

Information request 6.2: Child Care Subsidy taper rates

In the reformed CCS from July 2023, families earning over $80,000 and under $530,000 will receive a CCS rate that tapers down by 1 percentage point for each $5,000 of family income. When ECEC is established and recognised by Government as the entitlement of every child, policy and its settings will be required to deliver. While Government consider moves towards an equitable, aspirational, *child-centred side-supply model*[46] as proposed by the Centre for Policy Development, ECA supports increased investment by Government, equity of access, and generous proportionate subsidies including families with multiple children aged five or under in ECEC who are eligible for a

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[43] Organisation for Economic Co-operation and Development (OECD), *Net Childcare Costs (Indicator)* (2024), doi: 10.1787/e328a9ee-en

[44] Australian Government Productivity Commission. *Early Childhood Education and Care, Report on Government Services, Part B, Section 3* (2022, 7 June), https://www.pc.gov.au/ongoing/report-on-government-services/2022/child-care-education-and-training/early-childhood-education-and-care

[45] Australian Government Productivity Commission, *Early Childhood Education and Care. Report on Government Services, Part B, Section 3*

[46] CPD, *A New ECEC System for Australia. Draft for Input* [Unpublished], 2.

subsidy. Additionally, ECA supports low income families receiving a 100% subsidy to ensure that children's educational entitlement is reflected in equity of access to ECEC.

Information request 6.3: Level and indexation of the hourly rate cap

A higher hourly rate cap for non-standard hours is needed to reflect the additional costs associated with this type of care. Often, but not always, ECEC provided in non-standard hours is done so by Family Day Care services. The availability of ECEC during non-standard hours is important for families and children who need it, which can enable parents/carers to engage in employment and training and children to be cared for in safe and stable environments. The present hourly rate cap for non-standard hours available to ECEC services does not incentivise operating outside of standard hours. This needs attention and monitoring to better reflect costs associated with non-standard hours of operation. ECA is prepared to work with Government, alongside other peak bodies to advise on considerations for fair remuneration to reflect costs of provision over time.

Information request 6.4: Potential expansions: CCS to families with restricted residency; Assistance for Isolated Children Distance Education Allowance to preschoolers in isolated areas

ECA advocates for the right of every child to access quality ECEC, regardless of residency status or place of residence. Australian governments have the opportunity to co-develop with the ECEC sector, innovative models in areas of need. If ECEC is positioned as the entitlement of every child within Australian society, as it should be, the focus of Australian Governments and the ECEC sector shifts to 'how' to operationalise this. For some cohorts of children and communities, those who are *unserved* and *underserved*[47] (ACCC, 2024), contextualised, place-based solutions are likely to be most appropriate. Families with restricted residency and families living remotely, may be vulnerable and as such integrated models of ECEC delivery should be considered where ECEC services and other service delivery coordinate child and family services, serve as a conduit into the service system. Extending CCS to every child and simplifying the burden on families, demonstrates a commitment to children and their educational entitlement where they live. For children living remotely, innovative models of preschool delivery may look like a School of the Air model where families support the learning program which is planned and delivered remotely by a qualified early childhood teacher. The ECEC sector is dynamic and agile, and can be engaged to meaningfully contribute to a co-design process of place-based ECEC which is strengths-based and addresses barriers to children's inclusion and participation in ECEC.

Families with restricted residency in Australia and temporary protection visa holders can experience vulnerability in various aspects of their lives. An educator or a service's ability to be cognisant of these vulnerabilities and be able to tailor to their specific needs is particularly important. Otherwise, it can exacerbate challenges experienced by these families and cause further stress and anxiety.

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[47] Australian Competition and Consumer Commission (ACCC), *Childcare Inquiry. Final Report December 2023.*

Practice Example: Katherine School of the Air

In the NT, isolated children are supported to access free education, including preschool, via School of the Air. Expanding assistance to be inclusive of preschool aged children enrolled in a preschool program would help advocate the importance of access to early learning for these children, may assist with early identification of any learning or development delays and help ensure these children are achieving their learning and development milestones at the same pace as children in urban areas.

Information request 6.5: Potential measures to reduce CCS administrative complexity

A simplified subsidy system will help families access affordable and predictable education and care services for their children. A simpler and fully transparent funding and subsidy system is essential to ensure every child can thrive and learn, and parents and carers can be supported to work, study, address challenges they are facing in life, and/or that they can choose to complement their child's home experiences with ECEC.

The complexity currently associated with the CCS Activity Test eligibility requirements, the application process and updating family income estimates on a regular basis can create confusion and inadvertently, a barrier to participation in ECEC.

For culturally and linguistically diverse cohorts, the administrative aspects associated with accessing CCS requires a level of language, literacy and numeracy comprehension, as well as digital literacy skills to navigate through the Services Australia's digital platform.

ECEC services currently support families with CCS access and application for ACCS on their behalf, which creates additional administrative burden in requesting, checking and following up on the CCS status for each child. By way of example, in 2023, the NT conducted an audit of the 41 CCCFR services. The project found that the administrative burden placed on services to support the CCS application process for Aboriginal families creates additional barriers and can prevent access and participation for children experiencing vulnerability and disadvantage.

Streamlining requirements such as allowing families who are already eligible for income support payments or a Health Care Card to be automatically eligible for CCS and ACCS should be considered. This would eliminate the need for families to tell their stories to multiple parties to access different government services, and may also streamline the administration for services to assist families with the application process at the point of enrolment.

While removing or modifying the Activity Test and reducing the administrative complexity of CCS may improve access, an increase in demand needs to be carefully balanced with the availability of quality service provision to make a genuine difference in children's learning and development. Consideration to ensure there is adequate infrastructure, workforce supply and quality services that meets the NQF is paramount, particularly in remote communities.

Information request 9.1: Scope for broader funding reform

At the 2022 World Conference on Early Childhood Care and Education, all participating members adopted the Tashkent Declaration[48] for early childhood care and education. UNESCO member states have pledged to invest at

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[48] UNESCO, *Tashkent Declaration and Commitments to Action for Transforming Early Childhood Care and Education* (2022, November 16), https://www.unesco.org/sites/default/files/medias/fichiers/2022/11/tashkent-declaration-ecce-2022.pdf

least 10 per cent of total education spending on pre-primary education and to ensure that salaries and working conditions of preschool personnel are at least at par with those pre-primary education teachers.

The Barcelona targets for 2030[49] recommended by the European Council of the European Union further commits member states to meet specified targets to increase children's participation in early childhood education and undertake actions to provide more accessible, affordable and better-quality care.

In Australia, the National Agreement on Closing the Gap[50] have set an ambitious target for Aboriginal and Torres Strait Islander children to engage in high quality, culturally appropriate early childhood education in their early years.

These national and international commitments provide the scope for broader funding reform in ECEC to support sustainable development for the sector. However, given the makeup of ECEC service settings vary between jurisdictions, the one size fits all approach means that equal distribution of funding at the system level is not sufficient to support equitable access to ECEC. In some jurisdictions, the cost of quality preschool delivery[51] is significantly higher than the national average, largely reflecting the cost of delivering government preschools, disproportionate funding models, high levels of disadvantage, resource limitations and supply challenges in remote and very remote areas. Funding provided under the *Preschool Reform Agreement 2022-2025* should better reflect these differences.

Practice Example: Family as First Teachers (FaFT) program

The Family as First Teachers (FaFT) program uses the Abecedarian Approach Australia, a set of evidence-based teaching and learning strategies for early literacy and numeracy supporting adult-child interactions to maximise children's learning outcomes. Recent extension to the National Partnership on Northern Territory Remote Aboriginal Investment (NTRAI) demonstrates that the design of long-term investment options are needed to ensure continuity of funded services, while empowering and developing the capacity of communities and Aboriginal Community-Controlled Organisations (ACCO) to drive and own desired outcomes alongside governments.

Practice Example: KindiLink WA

KindiLink is a play-and-learn initiative for Aboriginal and Torres Strait Islander children who are not old enough to enrol in school. KindiLink is provided in 38 public schools. Children attend with a parent/carer for six hours a week. KindiLink offers high quality play-and-learn sessions for children and their parent/carer at the participating schools, at no cost to families. Families are supported by a teacher and Aboriginal and Islander Education Officer to be actively involved in the activities with their children.

Children and families from outside a KindiLink school's catchment area are welcome to participate in KindiLink. Where room also exists, and with support from attending families and the local community, non-Aboriginal children and parent/carers may be invited to participate.

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[49] Council of the European Union. (2022). Council recommendation on early childhood education and care: the Barcelona targets for 2030, Interinstitutional File: 2022/0263(NLE). https://data.consilium.europa.eu/doc/document/ST-14785-2022-INIT/en/pdf
[50] Council of the European Union, *Council Recommendation on Early Childhood Education and Care: the Barcelona Targets for 2030,* Interinstitutional File: 2022/0263(NLE) (2022), https://data.consilium.europa.eu/doc/document/ST-14785-2022-INIT/en/pdf
[51] Australian Government Productivity Commission, *Early Childhood Education and Care. Report on Government Services*, Part B, Section 3 (2023, June 6), https://www.pc.gov.au/ongoing/report-on-government-services/2023/child-care-education-and-training/early-childhood-education-and-care

Information request 7.1: CCCF as a vehicle to address practical barriers to ECEC access

On the whole, ECEC services are seeking more flexibility to enable them to provide wraparound support to meet the holistic needs of children and families and respond to the needs of communities as they evolve.

The NT has the highest proportion CCCFR services nationally, most of which are in remote and very remote locations with limited resources in the vicinity. The associated costs to transition 41 CCCFR services into a regulated environment (future aspiration) will require consideration on how service provision and quality can be maintained and provide communities with continuity of service with minimal disruptions to access when funding agreements or service provider changes.

Meaningful engagement by the Australian Government with key stakeholders including ACCOs, is required to better understand the conditions under which CCCFR services potentially moving to become regulated settings, may be supported by the communities where these services operate.

In 2023, the NT conducted the CCCFR Quality Review Project. Services raised concerns on the flexibility of the CCCFR funding guidelines and noted that the impact of not being able to utilise CCCFR funding to meet early childhood community needs as they change over time. The inability to deviate from the traditional model of 'childcare' is challenging as services struggle to sustain a service or recommence service provision due to staff attraction and retention issues. All services provide food for children and some services transport children to and from their homes.

Information request 7.2: 'System navigator' roles in the ECEC sector

On face value, ECA supports having system navigators embedded in the ECEC sector. However, significant work will be needed to understand how this model will work in Australian service delivery, given the lack of empirical evidence about the implementation, outcomes and sustainability of navigation models.[52] At present, there is a lack of clarity, clear consensus and coherence in the navigation role, and what skills, attributes and training requirements help people in this role to succeed overall, let alone within the ECEC sector.[53]

Notwithstanding this, the limited evidence available does suggest the keyworker/navigator model is acceptable for working with families. Weis and Sweeney (n.d.) report that the literature has identified many benefits for families working with navigators, including more positive and sustained life outcomes, greater connection to communities and local services, and sensitivity to needs and cultures.[54] They also report that navigator programs have been successful with families facing a range of challenges, which would include young parents.

One recent Australian study reported that families who have a key worker have better relationships with services, fewer unmet needs, better morale, more information about services, higher parental satisfaction and more parental involvement than those not receiving this service.[55]

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[52] Sophia A. Harris, Michelle Harrison, Karen Hazell-Raine, Catherine Wade, Valsemma Eapen and Jane Kohlhoff, Patient navigation models for mental health of parents expecting or caring for an infant or young child: A systematic review, *Infant Mental Health Journal* (2023), 44(4), 587-608. https://doi.org/10.1002/imhj.22075

[53] Alison Drennan, MSCOT, Teena Wagner, and Peter Rosenbaum, The 'Key Worker' Model of Service Delivery. *CanChild* (2023). https://www.canchild.ca/en/resources/85-the-key-worker-model-of-service-delivery

[54] Kim Weis and Millie Sweeney, *Family navigator model: A practice guide for schools*, (Mental Health Technology Transfer Center Network, n.d.), http://cars-rp.org/_MHTTC/docs/PS-MHTTC-Family-Navigator-Model.pdf

[55] Dana Young, John Reynolds, Utsana Tonmukayakul, Rob Carter, Elena Swift, Katrina Williams, Rachael McDonald, Dinah Reddihough, Rod Carracher, Paul Ireland, Jane Tracy, Cassie Kenyon and Lisa Gibbs, An Intervention to Improve the Self-Efficacy of Key Workers to Support Parental Wellbeing at an Early Childhood Intervention Service in Australia: A Stepped Wedged Randomized Cluster Trial, *Disability and Rehabilitation* (2022), DOI: 10.1080/09638288.2022.2117865

System navigator roles are particularly important for families from culturally and linguistically diverse backgrounds and those experiencing vulnerability and disadvantage. In remote communities, system navigator roles extend to the range of government services which are often fulfilled by service providers. The role of the inclusion support agencies could be expanded to include navigator roles and family support workers to address access barriers and connect families to service systems.

Information request 7.3: Barriers and potential solutions to providing more flexible sessions of ECEC

Providing ECEC for children of families whose employment, study and/or training is irregular or does not follow regular patterns, requires flexibility and agility. Early Years Hubs where integrated services are available for families could be one such setting where more flexible models of ECEC are trialled and explored. This could look like a range of formal and informal services including stay and play sessions, and advice on parenting, health, employment and family services.[56] This could translate to a hub and spoke model where service delivery is not centralised, coordinated by local government to better service the children and families in their communities.

Where centre-based services apply and are approved by the regulator to provide out-of-scope occasional care, they are able to then backfill vacancies. Data of these vacancies could be collected and coordinated by local government, for their respective state and territory governments, the Commonwealth, with oversight from the proposed ECEC Commission. This may be one way which could be tested through a pilot project to see how 'air pockets' in the system could be addressed. Unserved and underserved children and families, and communities should be prioritised.

ECA is available as a collaborative partner or to lead consultation and research into potential models for more flexible sessions of ECEC.

Information request 7.4: Availability of occasional care

Occasional care is defined as, 'Primarily ad hoc or casual education and care (commonly referred to as occasional care)'.[57] For unserved, under-served and adequately served children, families and communities, occasional care is an education and care type which can respond with some agility where other education and care types are not available, building on from where there is evident demand, such as through supported playgroups. Innovation for these communities is needed. For some families, the provision and availability of Occasional Care offers some flexibility where they are not required to commit to regular hours, but there is availability when and as needed.

Through Government investment in a funding model[58] which has flexibility and responsiveness for different education and care types to be established and thrive in response to community need. In seeking improved and more equitable service delivery, it is important that innovative models are not discounted without careful consideration by Government. It may be that a combination of complementary service types is highly appropriate. These may include; Occasional Care, Family Day Care, In-Venue Care, and a remote model of preschool access, much alike the School of the Air model; as well as centre-based care as appropriate.

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[56] 56 NESTA, *Transforming Early Childhood: Narrowing the Gap Between Children from Lower- and Higher Income Families* (2024), 30. https://apo.org.au/sites/default/files/resource-files/2024-02/apo-nid325651.pdf
[57] Australian Children's Education and Care Quality Authority (ACECQA). (2024). 2.1 What is an education and care service? 2. Service approval. Section 2: Applications and approvals. *Guide to the NQF.* https://www.acecqa.gov.au/national-quality-framework/guide-nqf/section-2-applications-and-approvals/2-service-approval/21-what-education-and-care-service
[58] Australian Competition and Consumer Commission (ACCC). (2024). *Childcare inquiry. Final Report December 2023.* Commonwealth of Australia. https://www.accc.gov.au/system/files/ACCC%20Childcare%20Inquiry-final%20report%20December%202023.pdf

One challenge of occasional care provision is that the occasional care service needs to be open and available and flexible to family and community need, which may see some days of the service only attended by small numbers of children or none at all; other days may see numbers of children high. A funding model which supports some or all costs of maintaining the occasional care service is needed, so that this service is open, available and agile to family and community need.

Information request 8.1: Provision of service ratings information for families

ECA suggests that insufficient investment has been made in communicating with families about the types of services available, the national quality ratings and how to assess the suitability of a service for their needs. The Starting Blocks website is under resourced and not effectively promoted to families. Information also needs to be available to families on a range of platforms – including State/Territory Education Department websites.

Parents/carers accessing ECEC should be provided transparent, clear and current information about the quality of services, so that they can be confident in the quality of care and education their child is receiving. Some jurisdictions and services already do this through providing guidance for discussions with families about service quality, for example in NSW.[59] However, this is not a mandated requirement and many parents source recommendations from their friends or social media, or read unmoderated reviews online. Parents/carers often don't know that there is an official quality rating that is independently provided under the NQF.[60]

The credibility of service ratings and their usefulness for families is dependent upon how recently services were rated and assessed. The turnover of staff and leadership in ECEC and OSHC settings means that services can change in philosophy, pedagogy and practice between assessment and rating cycles, and where there are backlogs in assessment and rating these cycles can be lengthened. In these circumstances, the service rating may not be representative of the service today which then undermine trust of families who do apply the service ratings in their decision-making.

Information request 8.2: Regulatory actions against serial underperformers & Information request 8.3: Support for services to meet the NQS

ECA supports an ongoing relationship between the state and territory Regulator where the Regulator supports capacity building through regular contact with ECEC services. Providing jurisdictional regulatory authorities with greater resources, funding and provisions to enact and utilise all powers of the National Law would strengthen its ability to undertake more proactive actions and regulatory actions against serial underperformers rather than reactive measures. Practice examples from Victoria and NSW are provided below.

Greater support for ECEC services to meet the National Quality Standard will benefit approved providers, educators and most importantly, children and their families. ECEC services can be both protective and risk factors in the vulnerability of children and families.

> *Best practices in supporting young children's mental health and wellbeing are associated with improved socioemotional development (Blewitt et al., 2021; Murano, Sawyer, & Lipnevich, 2020). As well as acting as a protective factor in and of themselves, ECEC services can help children and families build protective*

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[59] New South Wales Government, *Choosing a Quality Service* (2024), https://education.nsw.gov.au/early-childhood-education/information-for-parents-and-carers/choosing-a-service
[60] Australian Children's Education and Care Quality Authority (ACECQA), *Families Qualitative Research Project – Stage 2. Final Report* (Hall & Partners, 2018), https://www.acecqa.gov.au/sites/default/files/2018-11/FamiliesQualitativeResearchProject2018Report.PDF

factors and resilience (Jordan & Kennedy, 2019; Tseng et al, 2019). Conversely, poor-quality ECEC services can themselves be risk factors, as children can be adversely affected by stress in both home and caregiving environments (Harvard University Center on the Developing Child, 2016).[61]

It is particularly important that we deliver high quality ECEC in communities where children are at increased risk of disadvantage or vulnerability. Providing high quality early education experiences can restack the odds for children who otherwise might do poorly in the education system. Educators working in disadvantaged communities may need extra support.

Educators in socio-economically disadvantaged communities are more likely to be early school leavers, and to earn lower income for their level of qualification.[62] They may also be experiencing a higher level of challenge in their day-to-day practice with children. Where services are not meeting the quality standards programs that provide support, coaching and professional learning can make a significant difference. Three examples are provided below – Be You which is available nationally, the Kindergarten Quality Improvement Program from Victoria and the Quality Support Program from NSW.   A new ECEC Commission could work in partnership with state and territory governments to strengthen quality in communities at risk of disadvantage.

Practice Example: Be You

Be You (**beyou.edu.au**) is the National Mental Health in Education Initiative, funded by the Federal Department of Health, managed by Beyond Blue and delivered by headspace and ECA. Be You works directly with early childhood services to engage education teams in professional learning and whole-of-service improvement plans to strengthen social and emotional learning for children as well as educator wellbeing. Be You consultants provide support to services and also collaborate with other government funded initiatives and activities (e.g. Commonwealth and State funded Inclusion Support Agencies and State funded capacity building initiatives such as Kindy Uplift in Queensland and School Readiness Funding in Victoria) to increase impact.   Supporting educators working in vulnerable communities is important and programs such as Be You also address educator vulnerability when present (Be You, 2021).[63]

Practice Example: VIC Kindergarten Quality Improvement Program (KQIP)

Established in 2018, the Kindergarten Quality Improvement Program is a professional development initiative that provides intensive and targeted support to Victorian ECEC services with identified quality improvement needs. The program focuses on continually improving the quality of early childhood services, including but not limited to improving Governance and Leadership (National Quality Standard Quality Area 7) and Educational Program and Practice (National Quality Standard Quality Area 1). Since 2018, more than 500 unique funded kindergarten services have been or are being supported through the Program. In 2021, the program was modified to reflect a more flexible format for a greater number of eligible services identified as requiring additional support.

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[61] Be You, *Engagement with Vulnerable Children and Families: Participation and Possibilities* (2011), 8, https://www.earlychildhoodaustralia.org.au/wp-content/uploads/2022/03/Be-You-engagement-with-vulnerable-children-and-families-Participation-and-possibilities.pdf
[62] Jennifer Louise Jackson, *Towards Inclusive Workforce Development: Socio-Economic Diversity in the Australian Early Childhood Workforce and its Implications for Practice* [Doctoral Thesis, Victoria University] (2018).
[63] Be You, *Engagement with Vulnerable Children and Families: Participation and Possibilities* (2011), https://www.earlychildhoodaustralia.org.au/wp-content/uploads/2022/03/Be-You-engagement-with-vulnerable-children-and-families-Participation-and-possibilities.pdf

Practice Example: NSW Quality Support Program

The Quality Support Program (QSP) - Dual Program Pathways is a professional learning partnership between ACECQA and the NSW Department of Education as the NSW Regulatory Authority (RA) for children's education and care services and providers.

The program was established to support the ongoing quality improvement of eligible children's education and care services in NSW rated as Working Towards National Quality Standard (NQS) and/or with identified compliance support needs. The program offers free tailored support and professional learning, delivered by ACECQA. Each participating service is allocated an experienced and dedicated support facilitator who works alongside service leaders to coach and guide them through the improvement process. The tailored professional learning and support program may also include face to face, online and telephone coaching support, online learning modules and workshops and other informative resources to support quality outcomes for children and each unique service context.

Between March 2018 and June 2023 (Stages One to Five), 915 services have completed the QSP/DPP, providing education and care for approximately 85,000 children (Stage 5 Evaluation Report). According to the evaluation report, the Quality Support Pathway (14 weeks) resulted in higher service ratings and increased number of elements 'Meeting NQS' as well as higher confidence and morale. The Compliance Support Pathway (6 weeks) achieved improved knowledge of implementing management systems to support compliance, improved understanding of the National Law and Regulations and gains on general knowledge of regulatory requirements.

Information request 9.2: An ECEC Commission

ECA supports the proposed ECEC Commission, we believe it should build on the success of ACECQA and incorporate its role in promoting national consistency in regulation.

As key recommendations and a path to universal ECEC is being considered and committed to by governments, much coordination is needed to ensure alignment of the policy reform landscape against broader social objectives, develop a mechanism to minimise the duplication of administrative efforts for governments, and support the realisation of system stewardship. This could include:

- training and education to enhance the steward's conceptual understanding of the system's intricacies, updates, and best practices

- offering insights into policies, regulations or governance frameworks that may impact the steward's decisions or responsibilities, such as establishing a framework that supports quality service provision and common principles that guide the range of out of scope services

- working in partnership with system stewards to conduct gap analysis and identify what model of service delivery and investment is required

- overseeing an agreed national research agenda for ECEC to capture progress against key ECEC commitments against the broad spectrum of reform agenda and recommendations as listed above

- providing governance, educational support and nationally consistent arrangements for ACCOs

- providing tools and technologic supports and solutions that streamline the steward's tasks and improve system management.

It is important that the ECEC Commission work in partnership with the sector, including peak networks and service providers. ECA suggests that the Commission convene sector advisory groups on key areas of challenge, including:

- meeting the needs of rural and remote communities and isolated families

- supporting and strengthening Aboriginal community controlled organisations

- supporting growth and expansion in the not-for-profit sector

- implementing the National Workforce Strategy

- data sharing and research.

Practice Example: State of Early Learning Report
ECA published the State of Early Learning Report in 2017 and 2019 to consolidate and compare data across the State and Territory jurisdictions and compare Australia's performance in early childhood education to international data. While the reports were well regarded and useful to policy makers, there was no easy way to resource this work to continue the publication. It is suggested that the ECEC Commission, once established publish an annual or bi-annual report on the performance of ECEC against key metrics such as quality ratings, workforce stability, preschool enrolment and attendance, inclusion and diversity as measures of access and affordability. Comparable reports are published in Canada and the US.

Conclusion

This time in early childhood education and care provides a unique opportunity of converging review and policy reform. Early Childhood Australia welcomes a child-centred view which sees policy and its settings equipped to better enable families as children's first educators. Early childhood is a critical time for early childhood development and reframing ECEC as pivotal in supporting children's early development[64] creates a shift in how the early years are valued. The Australian Early Development Census (AEDC) provides a population level measure of children's development. Research tells us that children who begin school developmentally vulnerable (on 1 or more AEDC developmental domain), are less likely to perform well academically, with impacts on wellbeing and even post-school options.[65][66] Children's entitlement to high quality early education and care is so much more than who they will become, it is about the rights, spaces, places and voice we give to children now in contemporary Australian society. By providing proportionate universalism in early childhood settings, we provide opportunities to children as our youngest citizens to develop, learn and thrive, we support families' in their role, and we also enable parents and carers to discern and make decisions about their engagement in employment, study and training. What is clear is that short term investment in the early years is needed while longer term, systemic

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[64] CPD, *A New ECEC system for Australia. Draft for input* [Unpublished].

[65] Sally Brinkman, Tess Gregory, John Harris, Bret Hart, Sally Blackmore, and Magdalena Janus, Associations Between the Early Development Instrument at Age 5, and Reading and Numeracy Skills at Ages 8, 10 and 12: A Prospective Linked Data Study. *Child Indicators Research* (2013), 6. 10.1007/s12187-013-9189-3

[66] Catherine Louise Taylor, Daniel Christensen, Joel Stafford, Alison Venn, David Preen, D., Stafford, J., Venn, A., Preen, D., & Zubrick, S. (2020). Associations Between Clusters of Early Life Risk Factors and Developmental Vulnerability at Age 5: A Retrospective Cohort Study Using Population-Wide Linkage of Administrative Data in Tasmania, Australia, *BMJ Open* (2020), 10. e033795. 10.1136/bmjopen-2019-033795

changes are worked towards for every child, family and community, particularly those currently unserved and underserved. The stewardship of such change will prove to be essential and ECA encourages the Government to work closely with the states and territories, regulators, peak bodies and the sector to best determine the remit, function and powers of the proposed ECEC Commission.

The ECEC workforce is the sector's greatest strength, and yet, until pay, conditions and professional recognition reflects this, recruitment and retention will be an ongoing problem. ECA points to the 4 pillars of Access, Inclusion, Affordability and Stability and its recommendations to the Commission. There is no one approach, no panacea of the challenges facing the early childhood sector. Instead, what is needed is a range of measures which intelligently reflect the complexity of working from what we have, to what we want for every child and family. Policy settings need to be tuned correctly to ensure a healthy, viable, high quality ECEC sector where complementary education and care types can thrive and approved providers have certainty and the capacity to deliver equitable, inclusive ECEC where children live.