

14 February 2024

To Whom It May Concern

RE: Funding for Early Childhood Education and Care

Thank you for the opportunity to provide a submission regarding the Productivity Commission's November 2023 draft report, *A path to universal early childhood education and care*. I am pleased that the Commission is undertaking this review. In writing this submission I also reference the November 2023 *Review of the Inclusion Support Program* undertaken by Deloitte.

The Productivity Commission's review paper covers a broad range of concerns regarding Early Childhood Education and Care (ECEC). While all of the areas discussed are of importance, I am focussing my submission on the existing Inclusion Support Program (ISP) funding model.

The review makes a number of statements about the importance of providing accessible and inclusive ECEC opportunities for all children. Key points include addressing the critical demand for a strong workforce, through better pay, working conditions and opportunities (page 5). The review also acknowledges the positive lifelong impact early intervention through ECEC can have on children with additional learning needs (page 11) and the relationship between quality and availability of staff for a service to meet the requirements of the NQF (page 22). It is clear from these statements that there is an inextricable link between providing quality educators in ECEC settings and lifelong educational outcomes for students attending those services. However, the assumption that the solution to the current workforce crisis is increasing salaries devalues the contribution educators make to the profession. While improving salaries in ECEC settings will contribute to making the profession more attractive, I believe the equally pressing, though more complicated, issue that the Government must address is the increasingly challenging working conditions faced by educators. The overwhelming majority of staff in ECEC settings choose to work in the field because of their love for the children in their care. They thrive on seeing children learn and grow, as they move towards commencing "big school". But educators in ECEC settings are crumbling under the increasing complexity of the learning needs of students, the prevalence of absent parenting and the lack of suitable further training opportunities. The Innovative Solutions mechanism for applying to receive funding for staff training is complicated and applications rarely get approved.

On page 27 of the review, the Association for Children with Disability notes the challenges families face in finding a caring learning environment for their children, when additional support might be required. This highlights the lose-lose situation faced by ECEC providers and families. Parents despair at trying to find suitable ECEC opportunities for their children and ECEC providers resist enrolling students with more complex needs as a sign of the buckling pressure they face to provide a quality education that meets the NQF, whilst managing staff who are feeling unsupported and under resourced.

Tyndale Christian School has a national reputation for its passionate commitment to the education of all children, irrespective of any particular learning challenges they might have. At our core, we believe every child is precious and deserving of a quality education, which includes access to our Early

Learning Centre (ELC). Presently, 52% of the students currently enrolled in the ELC at our Murray Bridge campus meet the criteria for a student disability adjustment (should the school measure of adjustment be applied). The educators in our ELC make daily sacrifices to educate the most complex and vulnerable students in our community. They do not come to work each day for the salary. They come to work because they passionately believe in making a difference in the lives of young people in a community that has a lot of disadvantage and disfunction. Key to their success is ensuring that there are adequate staff on the floor at any one time to meet the needs of the students.

Unfortunately, as the Principal, I see a significant weakness in the ISP model of funding for our ELC, when compared to the Nationally Consistent Collection of Data (NCCD) funding model that applies for students with additional learning needs in school. Where the NCCD provides funding that follows the needs of each child, the funding our ELC receives through the ISP is quite simply insufficient for the needs of our children. We have seen a steady decline in the additional hours being provided, with little transparency or justification for the reduction. Also unlike the NCCD, which utilises the expert advice of our staff to determine the level of additional need in each student, the judgements made by the ISP regarding our funding are not based on in-person, ongoing observations of the students. To suggest that determining the individual needs of a student can be based simply on a complicated paperwork trail, and not through detailed observations, is folly. Particularly in an ECEC setting, where many of the students are too young to have received a formal diagnosis, the imputed data gathered by our professional educators should play an important role in the decisions made for additional funding support. The Productivity Commission review acknowledges that currently only 1% of children in ECEC settings receive funding through the ISP (page 46). This can only be seen as a shockingly low figure when compared to the number of students receiving NCCD funding at school. The students in school receiving NCCD funding are the same students who attended our ELC and did not receive funding through the ISP. Clearly, the ISP system is grossly inadequate.

I was very pleased to read in both the Productivity Commission review and Deloitte report that a number of findings point to the complexity of navigating the ISP and a lack of consistency with other Government funding programmes. Draft recommendation 2.3 identifies improving the eligibility transparency and funding allocation for the ISP. Moreover, findings 13 through 21 in the Deloitte report are critically important and I would like to passionately advocate for their implementation by the Federal Government.

The Gonski Review, and in particular, the introduction of the NCCD funding model was a watershed moment in our country for children in schools with additional learning needs, who are just as valuable to our society as any other child. It has enabled schools like mine to provide the quality of education these students deserve. I believe that this review, should the findings and reforms be adopted, provides an equally important moment in time for the Government to transform funding for Early Childhood education in Australia and empower ECEC providers, such as my ELC, to provide the high level of support and care that they so desperately want to, but currently don't have the resources to do.

Tom Cowell
Principal