

Draft Report: A path to universal early childhood education and care
Queensland Government Submission

Submitted on behalf of the Queensland Government by:
Department of Education
30 Mary Street
BRISBANE QLD 4000
Telephone: 13 74 68
Website: <https://education.qld.gov.au>

Executive Summary

The Queensland Government is pleased to respond to the Productivity Commission's *Draft Report – A path to universal early childhood education and care* (Draft Report).

There has been tremendous progress over the last 15 years in improving the affordability, accessibility and quality of early childhood education and care (ECEC).

There is potential for state, territory and Commonwealth governments to continue to work together to enhance the early childhood landscape.

Early childhood policy and funding arrangements in Queensland are designed to secure the benefits of: improved cognitive development, social skills and long-term educational outcomes for children; and increased workforce participation for parents.

These dual outcomes were recognised in the draft ECEC National Vision, which was consulted on in 2023 to inform National Cabinet consideration of a final Vision in early 2024.

Since finalising its initial submission to the inquiry, the Queensland Government has released the:

- *Queensland Early Childhood Workforce Strategy*, which establishes shared priorities for Queensland's early childhood workforce across the sector; and
- *Putting Queensland Kids First: Giving our kids the opportunity of a lifetime* Consultation Draft, which aims to strengthen protective factors around children, young people and families through targeted investment in prevention and early interventions.

At a national level, the Disability Royal Commission (DRC), Review of the National Disability Insurance Scheme (NDIS), Australian Children's Education and Care Quality Authority (ACECQA) – Review of Child Safety Arrangements under the National Quality Framework (NQF), and Australian Competition and Consumer Commission Childcare Inquiry 2023 have all released their final reports.

These each contain early years related policy directions and proposals that would be of interest to the Commission, with significant implications for the ECEC sector.

1.0 Introduction

Early years are a crucial time for brain development, laying the foundations for learning and preventing other problems in later life. As such, ECEC is a social and economic imperative. This is reflected in the Queensland Government's:

- new *Putting Queensland Kids First* consultation draft, which seeks to strengthen protective factors around children, young people and families through targeted investment in prevention and early interventions; and
- record levels of investment in ECEC over the next four years (2024–2027) to: ensure kindergarten is free to all families; attract and retain a quality workforce; provide resources and professional development to services where children are more likely to experience disadvantage; and boost support for children with disability and additional needs.

The Queensland Government's initial submission to the inquiry in September 2023 included information about ECEC in Queensland and relevant Queensland Government programs and reforms, as well as key principles to guide future reform of the ECEC sector.

This submission highlights Queensland Government priorities regarding key recommendations in the Commission's Draft Report.

2.0 Response to the summary of draft recommendations

The following sections are organised under the headings set out in the *Summary of draft recommendations* section on pages 58-59 of the Draft Report.

2.1 Affordability and availability gaps need to be addressed to achieve universal access

Issues to be addressed (R5.1, 6.1 – 6.6)
<ul style="list-style-type: none">• Children most likely to benefit from ECEC attendance are missing out.• ECEC is less affordable for low-income families.• Activity test limits access for low-income families.• Poorer availability in regional and remote areas.• Complex subsidy arrangements are a barrier to access for some families.

- The Draft Report highlights that while many Australian children attend ECEC services and benefit from high quality ECEC, the children who would benefit the most are less likely to attend.
- The Queensland Government has a strong track record in providing children with quality early childhood education, emphasising accessibility and affordability.
- Universal access to quality early childhood education has long been a priority for Queensland, most recently exemplified by the Queensland Government's additional \$645 million investment to make kindergarten free for all four year old children, commencing 1 January 2024.
- In Queensland, kindergarten programs are delivered through long day care (LDC) services, standalone kindergarten services and state-delivered kindergarten (SDK). SDK is offered in 137 state schools that are: located at least 40 kilometres by road from the nearest approved kindergarten; in selected, discrete Aboriginal and Torres Strait Islander communities; or in other selected communities where there are barriers to accessing kindergarten. The Queensland Government also runs bespoke programs such as eKindy (delivered through Brisbane School of Distance Education), which engage children in remote parts of the state, and those who can't access a centre-based program due to travel, an itinerant lifestyle or medical reasons.
- Together with a range of universal and targeted programs to encourage kindergarten participation (e.g. Deadly Kindy Campaign, Kindergarten Inclusion Service), these offerings seek to provide for universal access to kindergarten across the state for eligible-aged children in the year before school, including to children in the most remote locations and hardest to reach cohorts.
- The draft Report also recommends that all children from birth to five years of age be afforded an entitlement of up to three days per week of quality ECEC, and that supply-side funding be provided by the Australian Government to support universal access in persistently thin markets.
- Any expansion of universal access to formal ECEC for younger children would require significant planning with a long lead time, consideration of the unique characteristics of ECEC delivery across Australian jurisdictions, and a very substantial investment in both operational funding and infrastructure (where there is space for this to be established). Care would be needed to: prioritise investment to where the evidence indicates this is most needed (e.g. for children from disadvantaged backgrounds); and not jeopardise delivery of existing service offerings, noting in particular the potential to exacerbate existing workforce shortages (especially in thin markets). States and territories would need to be closely consulted during any further consideration of this draft recommendation.

- Alternatives to formal ECEC for children from birth to three years old include playgroups and KindyLinQ in Queensland. These deliver flexible, less formal education and care, while providing an enormous benefit to a child’s development and facilitating socialisation between parents/caregivers.
- Regarding childcare subsidy arrangements, initiatives that target vulnerable children and families, with a focus on reducing their out-of-pocket expenses (such as increasing supports like the Child Care Subsidy (CCS) to 100% and improving access to the Additional Child Care Subsidy), would assist with affordability and access, noting the potential equity impacts on stand-alone kindergartens/preschools where CCS does not apply.
- However, the impact of higher rates of CCS and provider fee levels on attendance and out-of-pocket expenses may have flow-on implications for monitoring and regulation, which should be explored further. This should not result in an unfunded burden on state regulators.
- For any expansion of supports, consideration could be given to streamlining access for eligible disadvantaged families, and for foster and kinship carers. This would be in line with Action 6 of *Safe and Supported: The National Framework for Protecting Australia’s Children 2021 – 2031, First Action Plan 2023-2026*, which commits to better coordinate and improve supports for grandparents, foster and kinship carers.
- Finally, the Queensland Government recognises the benefit of greater support for labour force participation. The *Queensland Women’s Strategy 2022-27* has a central focus on supporting women’s economic security; and the *Good people. Good Jobs: Queensland Workforce Strategy 2022–2032* has a commitment to maximising workforce participation, particularly for people who have been previously underrepresented.

2.2 Availability can only improve if workforce challenges are resolved

Issues to be addressed (R3.1 – 3.7)

- | |
|---|
| <ul style="list-style-type: none"> • ECEC workforce attraction and retention needs to be a priority. • Low qualification completion rates and barriers to upskilling. • Inadequate professional development opportunities. • Additional barriers and inadequate recognition of cultural knowledge for Aboriginal and Torres Strait Islander people. |
|---|

- The Draft Report proposes a number of avenues to address workforce challenges, including wage increases that may relieve recruitment and retention challenges, support for professional development and acceleration of early childhood teaching qualifications. Under *Shaping our Future*, the national ECEC workforce strategy, jurisdictions are already collaborating on actions to address workforce issues in the ECEC sector.
- Wages and conditions of early childhood educators in Queensland fall under the responsibility of ECEC sector employers, in line with relevant legislation and industrial arrangements. However, improving the value placed on ‘women’s work’, especially in female dominated industries, will potentially address gender inequalities, such as the gender pay-gap and other longer-term issues such as low superannuation.
- The Queensland Government is committed to addressing workforce challenges in the early childhood sector, and increasing early childhood educator numbers. The *Queensland Early Childhood Workforce Strategy and Action Plan 2023–2027* is a \$120 million investment over four years that establishes shared priorities for Queensland’s early childhood workforce across the sector.

- Priority areas in this strategy include: professional recognition; qualifications, skills and pathways; staff attraction and maintenance; workforce expertise; strong leadership; and wellbeing and resilience.
- Work is already underway to deliver key actions, which include: a Centre for Early Childhood Educator Learning and Development; scholarships for early childhood professionals to attain or upgrade early childhood qualifications; subsidies to improve wages and conditions for early childhood teachers in long day care kindergarten services; incentives to attract and retain early childhood teachers in kindergarten services in regional, remote and very remote areas; extension of Kindy uplift programs to support professional development; partnering to provide mentoring and coaching programs for all early childhood professionals; delivery of qualifications on country; and wellbeing and cultural supports for educators.
- Notably, approved kindergarten services in Queensland have access to service location subsidies which are specifically designed to assist service providers to attract and retain a qualified early childhood teacher (ECT) to deliver an approved kindergarten program in outer regional, remote and very remote locations.
- Queensland has also expanded its Kindy uplift program to all approved kindergarten services (including sessional and long day care kindergarten services) with funding of \$112 million over four years. Kindy uplift funding responds to children's learning and development needs through evidence-based initiatives that lift outcomes for kindergarten children. It can be used to fund programs, resources, supports and professional development to build educator capability and support inclusion.
- The Draft Report recommends specific action by states and territories to improve teacher registration for ECTs. The Queensland Department of Education is already working with the Queensland College of Teachers to enable the voluntary registration of all Australian Children's Education and Care Quality Authority (ACECQA) recognised ECT qualifications to work in National Quality Framework approved settings.
- The Queensland Government also adopts a cross-government approach to supporting the attraction, retention and capability development of early childhood educators where appropriate:
 - To support development of the early years workforce, Queensland Health operates the *Healthy Kids* program, which works with ECEC services to build professional competency as part of a commitment to providing locally based solutions that best meet the needs of the community in which the services are located.
 - The *Good People. Good Jobs: Queensland Workforce Strategy 2022–2032* emphasises the need for a qualified workforce and collaboration between industry and education sectors.
 - The *Queensland Women's Strategy 2022–2027* includes a commitment to 'advocate to the federal government to use levers within their jurisdiction to improve the economic security, safety, empowerment and recognition of women and girls'.
 - A Queensland Vocational Education and Training (VET) Strategy is being developed to maximise outcomes from the government's investment in skills and training. The Queensland Government supports integrated and streamlined VET/University pathways, including for early childhood educators where relevant.
 - The Queensland Government is also making significant investments in Free TAFE to support the ECEC sector. In 2023 there were over 3,500 commencements in ECEC courses, with over \$17 million committed in funding for this training.

- With respect to First Nations educators, the Draft Report recommends improvements to pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications. The Queensland Government's *Paving the Way – First Nations Training Strategy* emphasises the importance of empowering community in increasing First Nations people's participation in skills and training, particularly in areas that are most needed (such as ECEC). The Queensland ECEC Workforce Strategy also includes specific actions to support First Nations early childhood professionals.
- The Queensland Government recognises that accessing quality and culturally responsive early childhood education and care sets the foundations for lifelong learning and positive life outcomes. A key component of the Early Childhood Care and Development Policy Partnership is building capacity and capability of Aboriginal and Torres Strait Islander Community Controlled Organisations (ATSICCOs).
- Queensland will continue to partner with and grow the ATSICCO sector to enable the community to design and deliver early childhood learning and development services that meet community need to support Aboriginal and Torres Strait Islander children and families to fully participate in ECEC programs.
- Queensland's Closing the Gap place-based partnership in Doomadgee is a commitment under the National Agreement, established to empower Aboriginal and Torres Strait Islander communities to work with key stakeholders to set their priorities to accelerate progress against Closing the Gap Outcomes. This includes Early Childhood as a priority area.

2.3 A universal ECEC system has to be inclusive of all children

Issues to be addressed (R2.2 – 2.6)
<ul style="list-style-type: none"> • Disability Standards for Education do not apply to all ECEC services • Only a small proportion of children with inclusion needs receive support • Subsidy design and rules for additional educators are restrictive

- The Draft Report outlines recommendations for Australian Government action to support engagement of children with disability in ECEC, and calls for improved coordination of inclusion funding.
- The Queensland Government agrees that early childhood services should be supported to deliver innovative, flexible, and responsive inclusion solutions that address identified barriers, e.g. through cultural advice, mentoring, bilingual support, and trauma-informed practices.
- In this context, Action 7 of *Safe and Supported: First Action Plan 2023–2026* (which aims to make significant progress in reducing the rate of child abuse and neglect and its intergenerational impacts) focuses on effective and timely responses for parents and carers with disabilities, and children and young people with disability and/or developmental concerns, promoting family-centred and culturally safe services.
- The Australian Government is leading implementation of recommendations from the 2020 Disability Standards for Education (DSE) review, specifically focusing on building awareness in the ECEC sector about their obligations under the *Disability Discrimination Act 1992* (DDA).
- The Queensland Department of Education has communicated DSE information and associated training opportunities to ECEC providers, supplementing Queensland's Inclusion Ready initiative which provides resources for sessional kindies and LDC services to enhance inclusive practices, pathways and partnerships.

- Queensland supports further consideration of recent Inclusion Support Program Review findings, which point specifically to the need for further clarity regarding navigation of the Australian Government’s Inclusion Support Program (ISP), such as through funding criteria and a definition of ‘additional needs’, other than disability.
- In addition, the Queensland Government has undertaken substantial work to ensure policy settings support inclusion and positive outcomes for all children in the ECEC sector, including for those with disability. These services seek to foster a proactive, universal approach to inclusion. This includes a total investment in kindergarten inclusion of \$91 million over four years.
- Queensland also funds over 100 non-government organisations (NGOs) across the state to support families to access services they need to ensure positive outcomes for their children and themselves. This includes referral pathways where the NGO supports families to access the assistance they need by other organisations or agencies.
- Nationally, both the Review of the NDIS and the Disability Royal Commission (DRC) will have implications for the ECEC sector.
- The NDIS Review recommends a focus on ‘foundational supports’, i.e. the “missing middle” between mainstream services and individualised supports offered through the NDIS. In the ECEC context, recommendations relate to strengthened early supports to children and families through mainstream and foundational support service systems. In December 2023, National Cabinet agreed to jointly design additional foundational supports with costs split between states and territories and the Australian Government, and noted delivery of foundational supports would be through existing government settings such as child care and schools where appropriate. As governments work through design and implementation considerations, significant work will be required to ensure the ECEC sector understands the implications of this decision, and is engaged in planning for delivery.
- DRC recommendations pertaining specifically to the early childhood sector refer to: establishment of a First Nations Disability Forum, which could direct funding to support First Nations community-based organisations in the health, criminal justice and early childhood sectors; and development of disability-inclusive cultural safety standards for provision of services for First Nations people with disability that would be adopted by disability service providers to support First Nations people with a disability in these sectors. The Queensland Government has committed to reporting on acceptance and implementation of recommendations arising from the DRC.
- Finally, the Draft Report seeks information on cultural safety in ECEC services for Aboriginal and Torres Strait Islander and culturally and linguistically diverse (CaLD) families and children.
- Recently updated NQF learning frameworks recognise the importance of valuing children’s cultures, and provide information and examples for educators on how to be culturally responsive. Cultural safety for both First Nations families and children, and CaLD families and children, relies on capability building for new and existing staff in ECEC services, and when prospective staff are gaining their qualifications.

2.4 ECEC services do not consistently respond to family needs

Issues to be addressed (R7.1 – 7.6, 9.1)
--

- | |
|---|
| <ul style="list-style-type: none">• Some families need additional support to access ECEC.• Limited access to ECEC services during non-standard hours.• Families do not use a significant amount of the ECEC they pay for.• OSHC services are not available at all primary schools where there is demand from families.• Dedicated preschool hours do not match the needs of working families. |
|---|

- The Draft Report recommendation that integrated services be available where needed accords with Queensland Government policy regarding integrated service delivery in the early years.
- The Queensland Government's *Putting Queensland Kids First* consultation draft clearly sets out the importance of integrated ways of working to connect Queenslanders to the support and services they need. This is critical in facilitating families' access to connected health, education and wellbeing supports.
- The Queensland Government already invests strongly across five funding categories in the early years, with over 90 Early Years Services (EYS) funded across the state, including two integrated family hubs (FamilyLinQ) on state school sites under development in partnership with The Bryan Foundation.
- Under Action 8 of *Safe and Supported: Aboriginal and Torres Strait Islander First Action Plan 2023–2026* and Action 5 of *Safe and Supported: First Action Plan 2023–2026*, the Queensland Government has also committed to strengthening the interface between policies and service systems for child safety and wellbeing, in order to achieve a holistic and coordinated response that contributes to addressing associated Closing the Gap targets. This initiative is led by the Department of Child Safety, Seniors and Disability Services and supports key areas for action in the Disability Sector Strengthening Plan.
- The Draft Report seeks to improve access to ECEC through service provision in non-standard hours (including through raising the hourly rate cap for ECEC delivered during these hours), and recommends state, territory and local governments examine their planning regulations to ensure they do not unnecessarily restrict the ability of services to provide ECEC during non-standard hours.
- The NQF already allows approved providers of centre-based services flexibility to offer ECEC during extended hours (including on weekends and overnight), though there may be an opportunity for the Australian Government to incentivise services in this regard. Queensland is not aware of any state-based planning regulations that might affect provision of care during non-standard hours.
- Family day care provides a notably more flexible model that can be responsive to family needs, especially in regional and rural communities, and consideration should be given to the role and potential contribution of this service type, particularly given the current viability issues faced by family day care and the steadily decreasing number of schemes and educators.
- The Draft Report also recommends that Outside School Hours Care (OSHC) be available where required.
- Together with all Australian governments, the Australian Children's Education and Care Quality Authority is working on changes to OSHC assessment and rating processes in response to the 2019 NQF Review. This work is likely to progress in the coming year, with consideration being given to the unique context of an OSHC service.

- Since May 2018, the Queensland Government has facilitated a 20% increase in OSHC places in state schools, recognising the significance of these services for workforce participation. However, guaranteed provision of OSHC in all settings is neither possible nor appropriate, especially considering challenges in certain locations like one-teacher schools or in locations of high demand. Any expansions to OSHC would also have potentially significant infrastructure, workforce and regional implications for services, with different impacts in unique state and territory contexts.
- As noted above, Queensland also funds NGOs to support children and families across the state. This includes funding for NGOs to deliver Limited Hours Care (childcare for up to approximately 20 hours per week); Vacation Care programs; and adjunct care services when families are accessing parenting programs and supports in the same location as where child care is being provided.
- Finally, the Draft Report expresses interest in better understanding use of transition to school statements and their contribution to effective transitions. In Queensland, Kindergarten Transition Statements provide a snapshot of each child’s knowledge, skills and dispositions for learning across the five learning and development areas in the Queensland Kindergarten Learning Guideline (QKLG). The statements are developed online and administered by the Queensland Curriculum and Assessment Authority, with parents/caregivers needing to give consent to their provision to the school and use in enrolment. Queensland state school teachers use transition statements to inform their approach and practice at the beginning of the school year.

2.5 Quality is paramount to achieving the benefits of ECEC

Issues to be addressed (R2.1, 8.1 – 8.4)
--

- | |
|---|
| <ul style="list-style-type: none"> • Timeframe between service assessments is too long. • Families lack current information on service quality. |
|---|

- The Draft Report outlines the potential for improved reporting on quality metrics, a new review of the NQF focused on the way services are assessed, and recommends the Australian Government provide additional funding to state and territory regulatory authorities (RAs) to support updated assessments.
- The Queensland Government agrees that quality is critical in securing the benefits of ECEC, and strongly supports the NQF in this regard.
- Both the NQF, and NQS enshrined within it, are subject to regular reviews, which serve to ensure that quality in the sector is maintained and enhanced over time.
- The Queensland Early Childhood RA (i.e. the Queensland Department of Education) regulates early childhood education and care services to reduce the risk to children’s safety, drive voluntary compliance and promote continuous improvement. ECEC regulation in Queensland is undertaken in line with the objectives of the NQF and the risk-based Regulating for Quality Framework.
- Regulating for Quality is designed to effectively identify and assess risks to the quality of ECEC services and ensure regulatory efforts are focused effectively on areas that present the greatest risk to the health, safety and wellbeing of children.
- Rates of notifications and complaints are escalating steeply across the sector, and the RA’s response to this rising demand and the serious risks that it represents is guided by the Regulatory for Quality Framework.
- Within this context, proactive service monitoring is critical. The RA is committed to regular risk-based monitoring of all approved services, and has a clear expectation of quality improvement when services are rated Working Towards NQS. A new three-year Targeting

Quality Program, delivered in partnership with ACECQA as the national body, provides tailored support for small and medium providers, particularly those in vulnerable communities, to improve service quality and meet the NQS.

- In relation to the question raised in the report about ‘serial underperformers’, Queensland notes the rising complexity of responding to non-compliance of the part of large entities that operate across multiple jurisdictions, particularly those operating services under multiple provider approvals. Further work, including potential legislative change, is needed to assess and address systematic risk across these ‘related-provider’ models, as the NQF currently limits RAs to action at the level of the individual provider approval.
- The Queensland Government has consistently supported a sustainable level of funding for the regulation of ECEC, stepping in when the Australian Government withdrew funding under the former National Partnership on the National Quality Agenda for ECEC. Queensland would welcome reinstatement of federal funding through an enduring commitment and adequate ongoing investment from the Australian Government.
- The potential for shared investment in ECEC regulation is a critical factor in states considering:
 - taking on regulatory oversight for any services currently outside the NQF;
 - introduction of any additional performance reporting requirements;
 - undertaking more frequent assessment processes;
 - taking forward any proposals to increase regulatory review requirements, which may result in an associated rise in complaints and notifications; and/or
 - increasing the frequency of assessments, especially in geographically dispersed jurisdictions that may already experience elevated workloads due to these unique circumstances.
- The Queensland Government is also working on options for the implementation of child safe standards and a reportable conduct scheme (RCS) in Queensland. These are being developed to respond to recommendations of the Royal Commission into Institutional Responses to Child Sexual Abuse.

2.6 New coordination mechanisms will support universal access

Issues to be addressed (R 9.1 – 9.2)
<ul style="list-style-type: none"> • Lack of clarity in roles and responsibilities between levels of governments. • Inadequate policy and funding coordination.

- The Draft Report proposes establishment of a new ECEC Commission to better coordinate and deliver ECEC policies and hold system stewards publicly accountable for achieving ECEC policy objectives. It also recommends that governments form a new National Partnership Agreement (NPA) for ECEC by 2026, which articulates the national vision for ECEC and clarifies roles and responsibilities between governments.
- The Queensland Government supports a cohesive and coordinated approach to ECEC, involving states, territories and the Australian Government, and is already accountable to the people of Queensland for associated policy and funding decisions, with sophisticated accountability, reporting and transparency arrangements, including annual reporting, Budget Estimates and other Parliamentary processes.

- The draft National Vision, developed collaboratively by all governments, sets out how governments will work together as system stewards, in partnership with the ECEC sector, including associated principles, outcomes, levers and enablers.
- Any further consideration of the establishment of a new national Early Childhood Commission or additional National Partnership Agreement would need to clearly articulate how these mechanisms would assist with issues identified in the Draft Report and ensure they do not serve to further complicate the early childhood landscape.
- In canvassing establishment of any new governance arrangements for ECEC, particular care would be needed to:
 - build on existing initiatives, rather than duplicate effort (noting the Early Childhood Policy Group (ECPG) currently plays a key role in setting, coordinating, delivering and monitoring the national policy agenda for ECEC);
 - avoid any potential conflicts with executive powers held by Ministers in administering their portfolios;
 - consider intersections with other regulatory and service delivery frameworks, noting early childhood education may be delivered through the schooling system;
 - consider intersections with HumanAbility, the newly formed Jobs and Skills Council, which has a remit to bring together employers, unions and governments to find solutions to skills and workforce challenges;
 - take account of local factors that need to be considered in service delivery, particularly in a diverse state like Queensland; and
 - not impose significant additional costs or administrative burden.

3.0 Conclusion

The ECEC sector plays a critical role in the economic and social fabric of the nation, and needs to respond over time to broader societal challenges and imperatives.

This requires a comprehensive and coordinated national approach, involving all Australian governments and the ECEC sector. This approach will be set out in the forthcoming National Vision for ECEC.

Bridging affordability and availability gaps is particularly important in enabling all children to have equitable access to high-quality ECEC services, and this hinges on resolving immense challenges in attracting and retaining a highly skilled early years workforce.

A strategic approach based on established reform principles identified in the Queensland Government's initial submission to the Commission can pave the way for a more accessible, inclusive, and high-quality ECEC system that truly meets the needs of all children and their families.