
ELAA'S SUBMISSION TO THE PRODUCTIVITY COMMISSION

MAY 2023



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AUSTRALIA

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ABOUT US

Early Learning Association Australia is the national peak body championing excellence in early learning for children and supporting parents and service providers. For over 30 years Early Learning Association Australia (ELAA) has been working with parents and early learning providers toward a shared vision of excellence in early learning for every child. We represent over 1300 service sites that deliver a range of early childhood education and care, predominately kindergarten and long day care, across Australia.

EXECUTIVE SUMMARY

All Australian children do not have equal access to early education

Participation in early childhood education and care (ECEC) delivers lifelong positive benefits, especially for children experiencing disadvantage or vulnerability. Given this, access to subsidised ECEC should not be dependent on a family's work status.

Despite a wealth of early childhood education and care (ECEC) service providers and funding models across Australia, not every child and family can access what they need to thrive. Indeed, the current system is overly complex and difficult for families to navigate.

ELAA believes the Productivity Commission should prioritise access and participation by simplifying systems and supporting families to enrol in ECEC.

ELAA's submission to the Productivity Commission outlines current gaps in the system and proposes solutions. Targeting government investments based on data and evidence will support every child to access ECEC.

This submission follows children's journeys from birth to primary school, aiming to have every child ready to start school despite any barriers they may face.

Equity comes at a cost and the government must fund services to deliver equitable and quality programs. This includes funding outreach, translators and providing support for vulnerable children and children with additional needs from time of enrolment, so that children do not start ECEC without the support they require to actively participate. Transport is a key consideration, especially for rural and remote services.





Close attention must be paid to maintaining and lifting quality by investing in workforce training and co-funding wages commensurate with the school sector. This includes funding the real costs of upskilling including income foregone when on practicum.

The Australian Competition and Consumer Commission Review into Childcare Pricing will provide insights into the additional costs of providing a quality program and should be considered in designing a funding system to ensure that price matches the cost of delivery and accounts for vulnerability and other factors including rurality.

The government should draw on evidence that the community sector is more likely to provide higher quality ECEC and to operate in areas of limited capacity – the childcare deserts.

Governments can expand capacity of the sector through a simple mechanism of enabling preschools and kindergartens who choose to access Child Care Subsidy to provide additional hours of ECEC beyond existing funded programs in order to meet family needs.

In addition, infrastructure investment should be focused on quality providers, with exploration of innovative solutions to support community providers to expand and funding models to support Aboriginal and Torres Strait Islander services.

We know what a difference ECEC makes to children's education and lifelong outcomes. It is incumbent upon Governments to ensure all children can access what they need to participate in a high quality ECEC system, with a view to co-funding and mandating participation in quality preschool once system capacity is built.



Solutions to make Australian ECEC accessible and equitable

IMPROVING ACCESS AND PARTICIPATION



Removing the Activity Test
to allow all children to
become eligible for 36 hours
of subsidised ECEC per week



Funding for children
needing support from
the time of enrolment



Fully funding the cost of ECEC,
including equity funding,
for children who are most
vulnerable



Removing barriers for access,
for example expanding the ACCS
Child Wellbeing Subsidy to be at
minimum up to 13 weeks



Funding transportation
for families in rural
and remote areas



Creating a subsidy system
that is easy to navigate and
fund linking agencies who can
support families to enrol and
participate in ECEC



Providing greater flexibility
in hours of support funded by
the Inclusion Support Program
to match patterns of children's
attendance



Co-funding the rollout
of two years of free preschool,
and requiring all providers
to meet high standards of
educational delivery



Mandating two years of preschool
before school for all children once
infrastructure and supports to
support all children to participate
equally is established

ADDRESSING THIN MARKETS



Enabling preschool and kindergarten
providers to access the Child Care
subsidy for additional hours of
ECEC beyond funded preschool/
kindergarten programs



Investing in sector development
by funding co-located ECEC services,
especially in low socio-economic,
and rural and regional communities
and funding staff to link families
to other supports



Promote self-determination
in funding models for Aboriginal
and Torres Strait Islander services,
funding alternate wrap-around
services decided by the community

Solutions to make Australian ECEC accessible and equitable (cont.)

TARGETING FUNDING TO DRIVE OUTCOMES



Funding ECEC

based on the real cost of quality delivery, drawing on data garnered through the ACCC review to identify the cost per age of child and additional costs due to factors such as location and vulnerability



Providing equity funding

targeted at the additional costs of service delivery to support outcomes for vulnerable children in every community



Integrate investments

into upskilling with paid practicum to support workforce growth and professionalisation



Investing in co-funding

improved wages and conditions to ensure ECEC wages and conditions are on parity with the school sector

LIFTING QUALITY ACROSS THE SYSTEM



Managing the market,

for example by examining the New Zealand approach and limiting the capacity of services and providers to grow unless they meet or exceed the national quality standard



Ensuring services that do not meet the National Quality Standards are rated annually, and all other services every three years, further strengthening the consistency and regularity of rating against the NQS



Supporting the community sector

to develop and grow through infrastructure investment, including funding innovative solutions to drive growth



INTRODUCTION

ELAA welcomes the Productivity Commission Inquiry into Early Childhood Education and Care, including the breadth of the terms of reference and coverage of issues including quality, access, affordability, and vulnerability.

We encourage the Productivity Commission to be ambitious in its recommendations. As a peak body for not-for-profit community services, many of whom operate at both State and Commonwealth funded services, we have seen the continuous challenges faced by services navigating different funding regimes, accountability requirements and service models. Families feel this most acutely, as they are entitled to different hours of subsidised education and care and pay different fees depending on if they enrol children in long day care or preschool/kindergarten. The multiple, confusing systems of early childhood education and care (ECEC) can be difficult for some families to navigate, especially for the most vulnerable and disadvantaged.

Our vision for the ECEC sector is framed around the needs of children at the centre. Early childhood is the period in which a child's brain experiences most of its development, and through quality ECEC we can protect against risk factors and support all children, particularly the most vulnerable, to remain developmentally on track and able to transition to school and succeed. In considering priorities for investment, we urge the prioritisation of initiatives that will increase access and participation of disadvantaged and vulnerable children.

Supporting vulnerable children to thrive is both good social policy and has long-term positive effects on the economy (Jones, et al., 2021). We know that nearly half of the children that start school behind stay behind, and that they are less likely to complete year 12 and go on to further education and employment. Further, they are likely to suffer the ill effects of this throughout their lives through higher welfare payments, chronic disease, mental health issues, housing issues and are more likely to be incarcerated (Lamb & Huo, 2017). If more children can start school developmentally ready, they are more likely to reach major education milestones and to transition to work and contribute economically. Additionally, this has flow on intergenerational impacts.

By structuring a funding system matched to need, managing the market to drive growth in quality provision and investing in the community sector to enable access in thin markets we can grow participation of vulnerable children and enable children to thrive.



IMPROVING ACCESS AND PARTICIPATION FOR ALL CHILDREN, AND PARTICULARLY THOSE EXPERIENCING VULNERABILITY AND DISADVANTAGE

All children benefit from attending quality early childhood education and care. Data links attendance at quality early childhood education and care (ECEC) to later outcomes. For example, Warren and Haisken-DeNew (2013) showed how children attending ECEC with a diploma or bachelor qualified educator in the year before school on average achieved higher NAPLAN scores. The impacts of participation in quality ECEC are felt much earlier than the preschool years, with much of children's brain development experienced in the first three years of life. For example, Sheila Degotardi has found that there is a huge gulf in language that babies are exposed

to depending on educator qualifications. Babies are exposed to around 11 words per minute in rooms where educators are least qualified, compared to 50 words per minute where they are bachelor trained. This difference can impact children's ongoing communication and language development, including their capacity to learn in school with children less likely to meet literacy benchmarks if they are not exposed to sufficient language when under three (Degotardi & Gill, 2019).

Given this, it is important that in prioritising access we do not lose sight of quality and diminish standards, or else children will not reap the educational benefits of ECEC.



Barriers to accessing ECEC

There are a range of factors that impact access to early childhood education and care (ECEC) including direct and indirect costs, parent's understanding of the importance of ECEC, physical and logistical barriers such as transport and stable housing and child readiness (Molloy et al., 2022).

Some children face significant barriers to engaging in education and care. Fees are not the only barrier to early childhood education but do pose a significant challenge to engagement in ECEC. Even small fees can pose a barrier to access for vulnerable children.

Throughout 2021, and again in an ongoing manner from 2023, kindergarten was made free in Victoria. Anecdotal evidence suggests that more vulnerable families and children enrolled in early childhood education and care. Similarly, during the height of COVID more vulnerable children enrolled in ECEC when fees were removed.

Children with a disability face barriers when engaging in ECEC, with one in five families changing childcare services to meet their needs including due to bullying and isolation of children with additional needs (AIFS, 2021). The community sector prides itself on being inclusive and ensuring more children with a disability can engage in ECEC with services investing significant funds to support inclusion (Goodstart Early Learning 2022; TICCS 2022).

However, federally funded support for children with disabilities, through the Inclusion Support Program, can be difficult to access and not cover the hours of a child's participation in ECEC. A key barrier is the delay, at times of several months, between a child commencing and funding and supports being received. Children need support from day one in ECEC. Mechanisms to ensure key information is passed on to service providers to facilitate provision of services should be explored, such as Victoria's Child Link (<https://www.vic.gov.au/child-link>) platform which aims to link service providers.

The most vulnerable children have the least access to subsidised care, with children from jobless families (1.6 percent of children) only entitled to 24 hours a fortnight of care as their parents do not meet the activity test. The AIFS evaluation shows there is a high concentration of vulnerable children in this group, because the Additional Child Care Subsidy is too rigid a mechanism to flexibly meet the needs of vulnerable children (AIFS, 2021).

A range of initiatives support access to early childhood education and care that could be extended across the system to support access. These include:

- Support for enrolment through a centralised process. In Victoria central registration and enrolments scheme (CRES) exists in many local government areas. These schemes enable families to enrol to gain a place in kindergarten through one system, and in some cases pre-enrol vulnerable children in liaison with family support workers.. Central enrolments can link ECEC to related services such as maternal child health nurses improving the early identification of families who require help to enrol from birth to primary. For more see: <https://www.vic.gov.au/kindergarten-central-registration-and-enrolment>.
- Investing in outreach and linker programs. The ECEC system is difficult for families to navigate, with services needing to support vulnerable families to access government infrastructure such as MyGov in order to access subsidies (AIFS, 2021). Every effort should be made to simplify enrolments, including providing access to outreach and linkers to support vulnerable families. Programs such Links to Early Learning were proven to support children who would not otherwise access ECEC to enrol (Dandolo Partners, 2021). These types of programs are operated on an ad hoc basis in some communities and funded by state governments or philanthropy. A nationwide approach is needed to ensure no children miss out.

Integrated services support children to thrive

First Australia's Early Years Education Program (EYEP)[™]– Kindergarten Model aims to support all children to succeed through a trauma informed, relational pedagogy approach to enable stable relationships with responsive caregivers to support emotional wellbeing and social competence. Kids First operates 12 kindergartens across regional and rural Victoria, with the majority being in communities with moderate to high levels of vulnerability.

Services are co-located with other family supports, such as maternal and child health services, family services, playgroups and evidence-based parenting programs and resources are offered through the kindergarten. As part of the model, trauma informed and relational training is provided for staff to strengthen their relationships with children and families, to understand and support children's emotional regulation, which helps children to navigate a variety of stressors including family conflict.

As Kids First is an integrated early years education and family services agency, early years staff can refer to and call upon the broader family services workforce and programs to support families in crisis, whilst access to a dedicated wellbeing program and an employee assistance program with counselling supports staff to maintain their own wellbeing.

The Kids First model is differentiated from standard kindergarten programs with all staff Bachelor qualified and high expectations set with high support, which includes intensive training on the model principles particularly in the areas of vicarious trauma and attachment and non-teaching hours allocated for professional reflective practice, training and coaching in the model.

Access to funding such as the School Readiness Menu and Kinder Inclusion Support has been used to supplement educator training and build further capacity.

The below data shows the impact of the model on quality as measured by the CLASS Scores.

What is the impact of the model on classroom quality?

	Emotional support	Classroom organisation	Instructional support	Total rating
Mean (SD), range				
All centres (n+11)	6.1 (0.80), 3.5-7.0 High-range	5.4 (0.8), 3.3-6.7 Mid-range	2.7 (1.0), 1.3-4.8 Low-range	4.6 (0.5), 4.2-5.6 Mid-range
E4Kids*	5.1 (0.9), 2.4-6.9 Mid-range	4.6 (0.9), 1.9-6.6 Mid-range	2.1 (1.8), 1.0-4.7 Low-range	3.9 (0.8), 1.9-5.75 Mid-range

EYEP-KM kindergartens scored higher than comparison data across all domains

- High baseline measure –difficult to show change over time due to ceiling effect

* Comparison From (taylor, Ishimine, Cloney, Cleveland, & Thorpe, 2013) N.B. E4Kids mean scores are caulated for centres in a wide range of socioeconomic status areas

The program is currently being evaluated by the Murdoch Children's Research Institute in a three-year formative and summative evaluation project due for completion in late 2023. The second-year data evaluation report has identified that families have reported feeling safe and welcome, the services are scoring higher than Australian comparison data across quality domains. These results are very promising and should be of interest to the Commission.

Note: *What Do CLASS Scores Mean?*

Trained and certified CLASS observers use the CLASS to capture both the lower-quality and higher-quality behaviors that are demonstrated in the classroom in each dimension. Scores are assigned using a scale across several important dimensions:

- **Low-range scores (1-2)** are assigned when behaviors associated with a dimension were demonstrated in a low-quality manner, were lacking, or were rarely present in the classroom interactions.
- **Mid-range scores (3-5)** are assigned when the classroom interactions associated with a dimension were somewhat present during the classroom observation or a part of some children's experience.
- **High-range scores (6-7)** are assigned when the classroom interactions were highly characteristic of a dimension during the observation. High-range behaviors are those that are meaningful, consistent, sustained, and reflective of everyone's experience in the classroom.

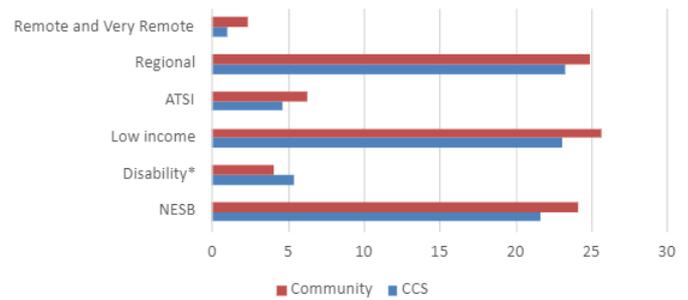
Who is and is not attending ECEC?

Access to ECEC varies across the country. Different types of provision have emerged throughout the country, from standalone kindergarten provided for free or at a low cost in Victoria and New South Wales to school-based models in Western Australia, whilst other forms of ECEC are provided by a blend of community and for-profit providers (Royal Commission into Early Childhood Education & Care 2023).

Education in the year before school – 600 hours annually of preschool or kindergarten dependent on the jurisdiction, is provided for free or at low cost across Australia under a co-funded State/Commonwealth agreement. Victoria is rolling out two years of free kindergarten for all children, whilst other jurisdictions have access to three-year-old preschool for certain cohorts of children.

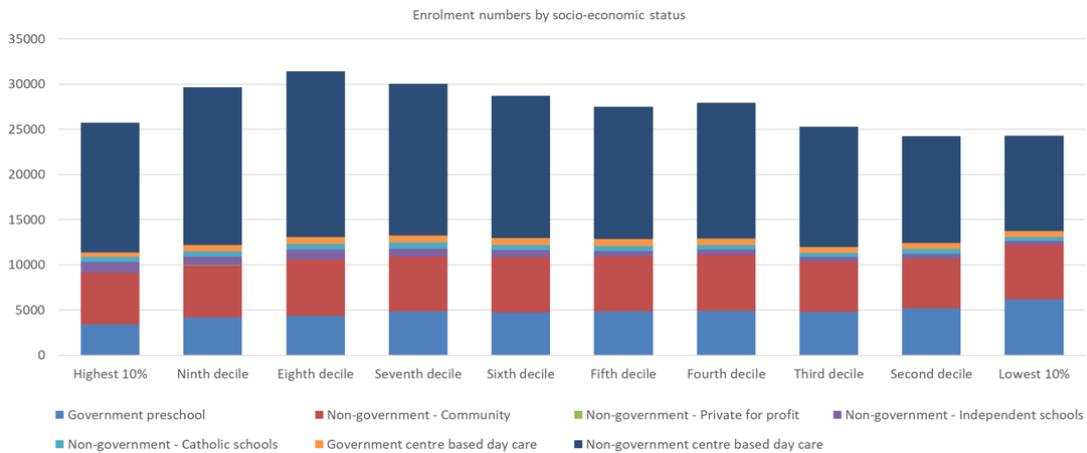
Children from a variety of backgrounds are less likely to participate in early childhood education and care. These include children who live outside major cities, children who are from low-income families and children who are from culturally and linguistically diverse (CALD) communities or who are Aboriginal or Torres Strait Islander.

Representation of 0-5 year old in community compared to CCS funded services (%)



Graph sourced from: Productivity Commission 2022, Report on Government Services 2022, Australian Government, viewed 09 May 2023. <https://www.pc.gov.au/ongoing/report-on-government-services/2022>

The community sector has strengths in engaging families who are less likely to be engaged in education and care, including operating in rural, remote and lower socio-economic areas. The graph below shows enrolments in preschool programs are highest in low socio-economic areas, in contrast to centre based day care (largely for profit) which are more concentrated in less disadvantaged areas.



Graph sourced from: Australian Bureau of Statistics (ABS) 2022, Microdata Download, ABS, viewed 09 May 2023. <https://www.abs.gov.au/statistics/microdata-tablebuilder/microdatadownload>

Links between ECEC attendance, readiness for school and vulnerability

There is an alignment between missing out on ECEC and being developmentally vulnerable – the cohorts we see accessing ECEC at lower rates are the same children that are more likely to start school behind their peers (The Front Project, 2022).

Most of children's brain development occurs before the age of three. Children face a range of risk factors that can impact their development, including unstable accommodation, family stress and violence and lack of access to nutrition. Other factors, called protective factors can help insulate children and reduce the impact of risks, including a warm, responsive relationships with parents and caregivers and access to quality early childhood education and care (Fox, et al., 2015).

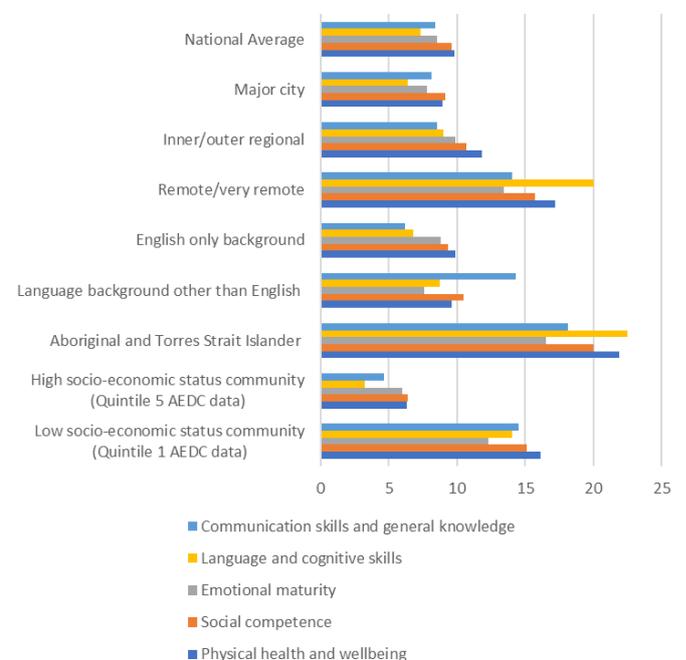
On average more than one in five children start school behind their peers. Children's developmental outcomes vary across Australia by geography, socio-economic status and children's cultural and linguistic backgrounds. We know early childhood education, when high in quality, can change children's life trajectory.

Developmental vulnerability is measured through a triennial census of all children in their first year of school, the Australian Early Development Census. It measures vulnerability in five areas, known as domains, that predict children's long-term outcomes. These domains are:

- Physical health and wellbeing
- Social competence
- Emotional maturity
- Language and cognitive skills (school-based)
- Communication skills and general knowledge (Australian Early Development Census, 2021).

Across Australia more than one in five children, that make up more than 60,000 children, are developmentally vulnerable. However, not all children are impacted equally.

The graph below demonstrates that there are multiple domains that impact children's exposure to developmental vulnerability. It demonstrates that children from lower socio-economic backgrounds are double as likely to experience vulnerability than their higher socio-economic background peers. It also highlights that Aboriginal and Torres Strait Islander children experience vulnerability more than double the amount that non-Indigenous children do. It is important to note that children that do not speak English as their first language face a considerable impact to their development, and especially so if they are not proficient in English by the time of starting school.



Data sourced from: Australian Early Development Census (AEDC) 2021, AEDC 2021 National Report, AEDC, viewed 09 May 2023. <https://www.aedc.gov.au/resources/detail/2021-aedc-national-report>

High socio-economic communities have lower levels of developmental vulnerability on average. They also are more likely to have higher participation in early learning including preschool, long day care and playgroups. This does not discount that these communities still have levels of vulnerability in them. For instance, in the suburb of Ku-ring-gai is an inner city New South Wales, high socio-economic region around one in six children are developmentally vulnerable and less than one in ten children has additional needs yet to be diagnosed (O'Connell, 2019). However, in the lower socio-economic suburb in outer regional Murgon in Queensland, nearly one in two children are developmentally vulnerable and a third of child are identified as having additional needs that are yet to be diagnosed.

This example showcases that a variety of factors impact children's engagement with and outcomes from ECEC. Some children face geographical barriers to participating in ECEC, whilst many children face barriers to the assessment of additional needs.

There is an increasing evidence base on what children need from an early years system, when, to what level of quality and for how long through Restacking the Odds.

Across Australia more than one in five children, that make up more than 60,000 children, are developmentally vulnerable. However, not all children are impacted equally.





Local evidence on quality and participation standards to drive educational outcomes – Restacking the Odds

Restacking the Odds looks at how existing service systems can work better together to improve outcomes for children by identifying five services that need to work together. These services are antenatal care, early childhood education and care, early years of school, sustained nurse home visiting and targeted parenting programs.

The researchers have set indicators for quality, quantity and participation and have validated these in communities.

The quality measure set is for services to exceed in quality areas 1 (*educational program and practice*), 4 (*staffing arrangements*) and 5 (*relationships with children*) and meet in all other quality areas.

Using the *Restacking the Odds* (2023) indicator the government can efficiently utilise the existing service system to increase outcomes for families, children and services.

The participation indicator is for all children to attend ECEC for 15 hours or more per week for the two years before starting formal school, whilst children more likely to experience developmental vulnerability to attend 15 hours per week for at least three years before school. This evidence base should be drawn upon to inform access to ECEC.

Area 1: Educational Program and Practice

A stimulating educational program which benefits the child's learning and development, that is child-centred and delivered by knowledgeable teachers and educators.

Area 4: Staffing arrangements

Teachers and educators that are highly trained in ECEC and can deliver meaningful relationships with children in a safe environment that encourages children's development.

Area 5: Relationships with children

Relationships between children and their educators and teachers that are respectful, responsive and ensure a child's sense of belonging within the community.

Given how impactful ECEC is to a child's education and life outcomes, it is incumbent upon governments to create a system to enable all children to access what they need to fully participate.

Once this system is built and at capacity, consideration needs to be given to mandating participation in education and care (two days of pre-school) for two years before school to ensure all children can benefit for high quality, play based, developmentally appropriate ECEC.

Recommendations to improve access and participation

Governments can reduce developmental vulnerability and address barriers to accessing ECEC through:

Removing the Activity Test to allow all children to become eligible for 36 hours of subsidised ECEC per week

Funding for children needing support from the time of enrolment

Fully funding the cost of ECEC, including equity funding, for children who are most vulnerable

Removing barriers to access, for example expanding the ACCS Child Wellbeing Subsidy to be at minimum up to 13 weeks

Funding transportation for families in rural and remote areas

Creating a subsidy system that is easy to navigate and fund linking agencies who can support families to enrol in ECEC

Providing greater flexibility in hours of support funded by the Inclusion Support Program to match patterns of children's attendance

Co-funding the rollout of two years of free preschool, and requiring all providers to meet high standards of delivery

Mandating two years of preschool before school for children once the system to support all children to participate equally is established

ADDRESSING THIN MARKETS

A key to improving access and participation is ensuring that services are available in all locations and operate the span of hours families need. They must provide access to the breadth of services disadvantaged, and vulnerable children require to support their development and engagement, and be held accountable to uniform, and enforced quality standards.

The Mitchell Institute produced a report on childcare deserts which shows how long daycare is not available in many communities across Australia (Hurley & Pennicuik, 2022).

The analysis does not include access to preschool/ kindergarten as these are usually provided on a sessional basis (for example at least 7.5 hour per day, 2 days per week in a school term) and provide less flexibility to accommodate working arrangements. ECEC services who mainly deliver ECEC in the year before school, usually kindergarten or preschool programs, are not able to access the Child Care Subsidy under section 194C of the Family Assistance act as a service cannot get Child Care Subsidy if it primarily provides an early educational program to children in the year that is 2 years before grade 1 of school.

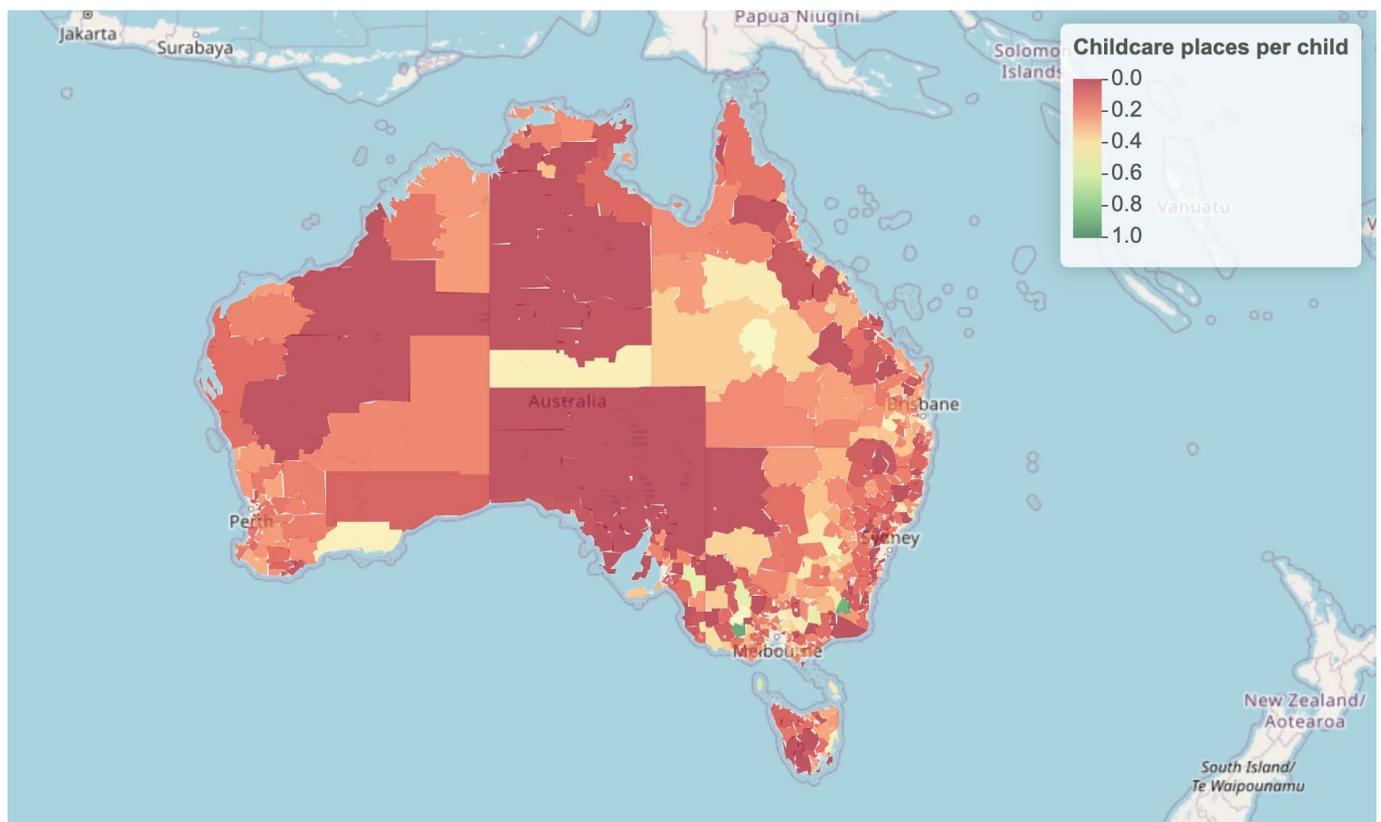


Image sourced from: Hurley, P., Matthews, H., & Pennicuik, S. (2022). *Deserts and oases: How accessible is childcare?* Mitchell Institute, Victoria University.

A key to improving access and participation is ensuring that services are available in locations and operate the span of hours families need.

There are over three thousand kindergartens and preschools across Australia who could provide access to ECEC for families outside of kindergarten hours if they could access the Child Care Subsidy. The map below superimposes kindergartens onto the Mitchell Institute deserts mapping across Victoria. Whilst not completely remedying the issue of deserts, it shows that the areas of limited access to ECEC would decrease.

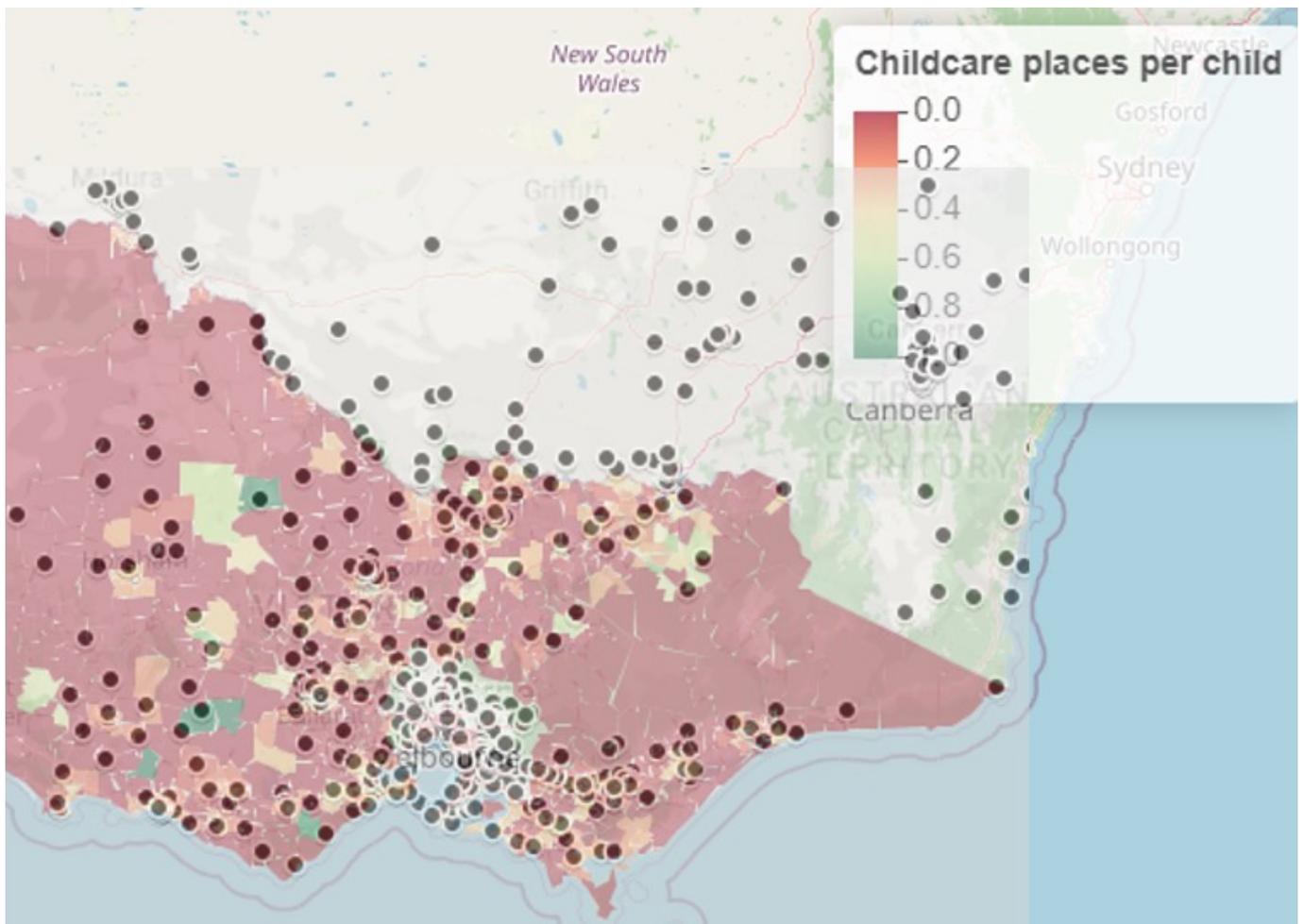
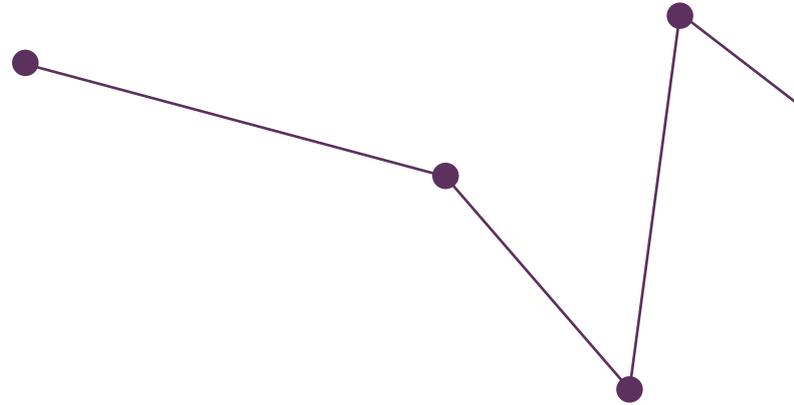


Image sourced from: Hurley, P., Matthews, H., & Pennicuik, S. (2022). *Deserts and oases: How accessible is childcare?* Mitchell Institute, Victoria University.

Better use of existing facilities by enabling access to Child Care Subsidy to kindergartens/preschools

Victoria has a proud and strong system of sessional kindergartens, with over 1,400 kindergartens across the state (ACECQA, 2022). Parents enrol children in sessional kindergartens for a variety of factors, including their deep connection with their community and higher quality ratings. However, the sessional kindergarten model, of children attending a limited (usually 15) number of government funded hours per week most often over two to three days – for example 8am to 3:30pm two days a week, limits the capacity of parents to work.

Some sessional kindergartens have overcome this barrier by offering extended hours and or days to families, but this is at full fees. For example, Glen Education provides families with the option of additional days of kindergarten. The full cost of these additional days is borne by families – a child attending 7.5 hours a day for 5 days a week for school terms would incur over \$10,000 in out-of-pocket costs (Glen Education, 2023). In addition Glen Education are trialling school holiday programs. In higher socio-economic suburbs there is demand for services such as this and parents can pay the significant out of pocket fees.

Alternately, in lower socio-economic suburbs there is equal demand but no capacity to pay, and in rural and regional areas the local kindergarten may be the only provider.

Enabling kindergartens and preschools to offer subsidised places outside of funding preschool hours would enable better use of existing infrastructure and support more families to access the ECEC they need to combine work and child rearing. It also maximises productivity in services by enabling teachers and educators who choose to work full time to do so, unlike in most kindergartens where roles are usually offered part time given the sessional operation.



Inequity in existing Child Care Subsidy Provider Rules

A kindergarten in country Victoria applied to deliver occasional and after kindergarten care in 2021. They did this prior to expanding the kindergarten offering so they could ensure their kinder hours, of 15 hours per week, were less than their CCS hours of 17 hours of care. As one of only two services in the community this made a big difference to families. However, with the scale up of kindergarten for 3-year-olds they now need to offer more hours of kindergarten than CCS places. They are unsure if they will continue to be able to deliver extra subsidised hours. In other rural communities, that offer 3 days of kindergarten, services are unable to offer CCS places on the other days.

Providers need to choose at present – will they prioritise kindergarten or long day care as they cannot do both within the rules. This is not fair for providers, children or families.

ELAA data shows that many kindergartens in Victoria would like to offer subsidised hours of education and care beyond funded kindergarten. ELAA has heard from our members that this would appeal to parents and increase their enrolments and would additionally save them money from covering current short term, financially unsustainable subsidies that they offer to families that require out of hours care. Across Australia there are over 3000 kindergartens, and many of these are the only ECEC services in their community (ACECQA, 2023) Enabling access to CCS for these providers could create places for an estimate of tens of thousands of families in areas of existing need.

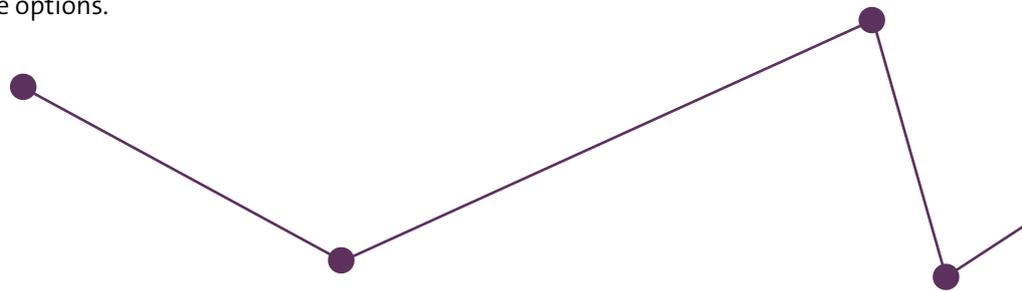
Investing in sector development including funding infrastructure and service models that meet community needs

A one size fits all model of ECEC funding, and ad hoc infrastructure funding, fails to address community needs. Many communities lack access to early childhood education and care that meets their needs, including vulnerable families and children with disabilities who face added complexity in matrixing together a range of service supports.

A better-connected system, of wrap around service provision on site and/or staff trained and paid to connect families to other services can improve uptake and outcomes. Addressing the needs of communities and improving access to tailored and innovative infrastructure funding will support community providers who wish to grow, but are not landholders, to explore options.

Across Australia there are a range of integrated ECEC models, that combine ECEC with access to other services such as playgroups, maternal and child health, allied health, adult education and parenting programs. Many of these models rely on philanthropic funding or as found in the South Australian Royal Commission, rely on services to subsidise through their network of provision (Deloitte,2023).

When combined with access to equity funding, co-located services can support the engagement and retention of children and families, strengthening the capacity of the workforce to identify trauma, vulnerability and support children and families.



Our Place – Doveton College

Our Place is a holistic place-based approach to supporting the education, health and development of all children and families in disadvantaged communities by utilising the universal platform of a school.

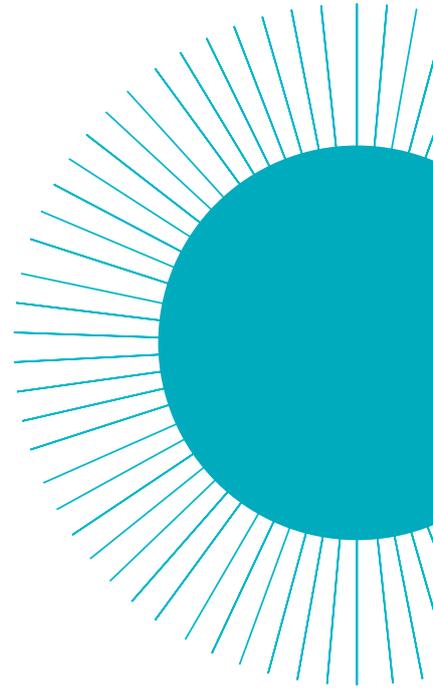
The first site for Our Place is Doveton college, with the model being implemented in ten sites across Victoria

Doveton College opened in January 2012. It offers a fully integrated wrap-around service including early learning, family support, maternal and child health and Prep to Year 9 (Doveton College 2014).

The primary aim of Doveton College is to provide a fully integrated model of education and community support to nurture children from pre-natal to early adulthood (Doveton College 2014). The College has a strong focus on early learning and early intervention, seeking to integrate both early years and family support services with traditional school education, adult education, facilities and services to support a community in need (Doveton College 2014).

Doveton College is supported by state and federal governments and the Colman Foundation. More than \$32 million was allocated to complete the building phase of the college, with additional funds allocated on an ongoing basis (Doveton College 2014).

The current model of CCS funding does not suit Aboriginal and Torres Strait Islander services, or any service in a very small community without economies of scale. A bespoke funding model is needed to ensure that, like with school, all communities can access culturally safe early childhood education and care. The Community Child Care Fund, which funds services at risk of closure, is not a sustainable solution in the absence of a funding model that works in areas of market failure where economies of scale are not achievable and the cost of delivery per child is elevated.



Recommendations to address thin markets

Governments can expand access to ECEC in thin markets by:

Enabling preschool and kindergarten providers to access the Child Care subsidy for additional hours of ECEC beyond funded preschool/kindergarten programs

Investing in sector development by funding co-located ECEC services, especially in low socio-economic, rural and regional communities and funding staff to link families to other supports

Promote self-determination in funding models for Aboriginal and Torres Strait Islander services, funding alternate wrap-around services decided by the community

The current model of CCS funding does not suit Aboriginal and Torres Strait Islander services, or any service in a very small community without economies of scale.

TARGETING FUNDING TO DRIVE OUTCOMES

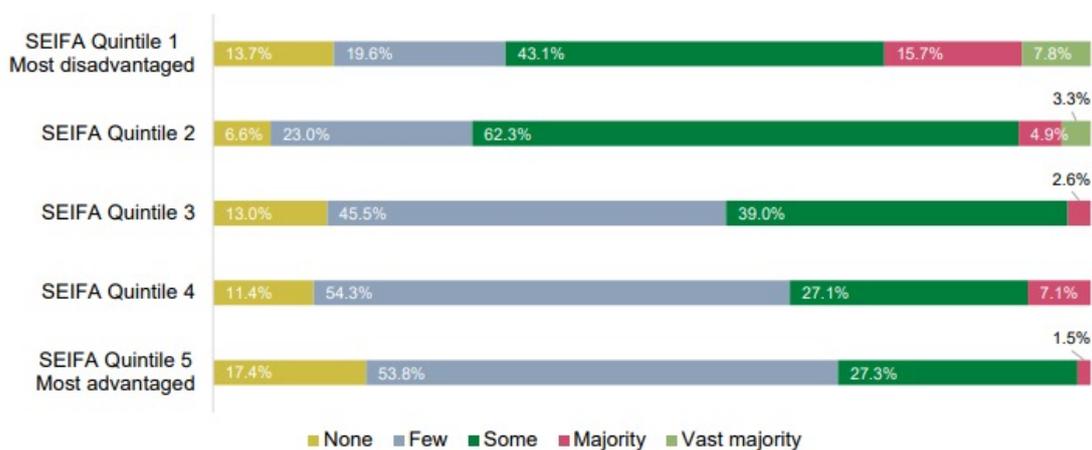
The Child Care Subsidy is a blunt instrument that does not recognise additional costs of delivery, including costs associated with a child's vulnerability or the nature of the local market. An exception is for the most vulnerable children who, if they are eligible for Additional Child Care Subsidy (ACCS), may result in a provider receiving a 120% subsidy based on the hourly rate cap. Accessing ACCS itself requires additional and ongoing engagement by service providers to refer families for assessment and support (AIFS, 2021). Only a small number of families are eligible for ACCS with 18,935 children accessing ACCS at the end of 2019 (AIFS, 2021). Services in the lowest socio-economic areas are unlikely to be able to levy fees above the hourly cap unlike in higher socio-economic services, therefore they operate on lower costs than services in other areas even though children's needs may be greater.

Data from the Trends in Community Children's Services Survey demonstrates how child vulnerability aligns with socio-economic status of families, with many families in the bottom two SEIFA quintiles vulnerable. Community-based providers are more likely to invest more funding in supporting children, including through investing more to retain highly trained teachers, providing professional learning and operating at lower ratios (Warrilow, Graham & Robertson 2021).

It is possible to lift participation and to ensure that children can access a range of early intervention services drawing on ECEC as the universal platform, if equity funding is provided and tied to interventions. A fixed rate of funding per child, as exists under the Child Care Subsidy, is insufficient to meet the needs of vulnerable children, especially for providers who predominately operate in vulnerable communities and/or who cannot offset costs by raising fees in other services.

In Victoria, School Readiness Funding (SRF) is a component of kindergarten funding that provides funds based on parental income and education level, albeit with limitations given the reliance on family self-reporting. Services can spend the funding on items from a menu of evidence informed programs focused on communication, wellbeing and access and inclusion.

Services can choose the supports their educators and children need to thrive, with support targeted to capacity building Services with over \$5000 in school readiness funding will have a proportion of their funding dedicated to allied health sessions with a local provider. This funding provides services with the flexibility to meet the needs of their children on an annual basis. For more see: <https://www.vic.gov.au/school-readiness-funding>.

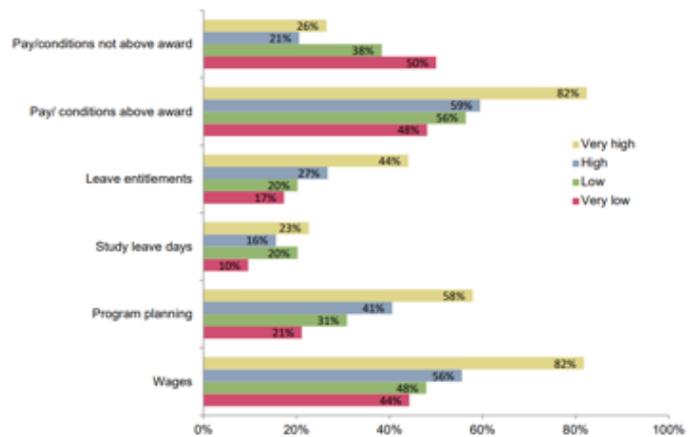


Graph sourced from: Warrilow P, Graham N and Robertson C 2021, NOT-FOR-PROFIT EDUCATION AND CARE: High quality, accessible and resilient, May, Australian Community Children's Services, Australian Community Children's Services.

Children only benefit from ECEC if it is of high quality, and data from E4Kids shows that children in low socio-economic areas are the least likely to receive high instructional quality (Torii et al., 2017). Quality is correlated with academic education outcomes. Research from Warren and Haisken-DeNew (2013) shows that children benefit most from access to highly trained early childhood education and care teachers and educators. Building and retaining a high-quality workforce is pivotal to driving improved school readiness.

Community based ECEC providers spend around 80 percent of their income on wages, and sometimes offer above award wages and conditions (Warrilow, Graham & Robertson 2021). Despite this, workforce shortages remain prevalent as wages and conditions for the same qualifications are usually well below school based counterparts (Warrilow, Graham & Robertson 2021).

Some exceptions occur, such as in Victoria under the Victorian Government subsidised Victorian Early Childhood Teachers and Educators Agreement (VECTEA) which provides a funding supplement for teachers. Under this agreement kindergarten teachers earn wages and experience conditions similar to in a school, and as a result vacancies for teachers are lower in these settings. TICCS data also shows the strong link between retention and pay and conditions with the graph below referencing the percentage of staff who have been with a service for three years or more (Warrilow, Graham, & Robinson, 2021).



Graph sourced from: Warrilow P, Graham N and Robertson C 2021, NOT-FOR-PROFIT EDUCATION AND CARE: High quality, accessible and resilient, May, Australian Community Children's Services, Australian Community Children's Services

To improve outcomes for vulnerable and disadvantaged children, we need to ensure they have a stable, well-trained workforce, and vulnerable families cannot afford to subsidise educator wages. Wages must be comparable with the schools sector, given the alignment in qualifications and the drift of the workforce to the higher paid sector.

Additionally building a pipeline of educators and teachers is possible, as has been shown in Victoria which has much lower levels of waivers in part due to significant workforce investments in incentives to upskill. The recent federal budget investment to fund the cost of the practicum is welcome, and ongoing support for upskilling across the sector is needed to build the workforce.

To improve outcomes for vulnerable and disadvantaged children, we need to ensure they have a stable, well-trained workforce, and vulnerable families cannot afford to subsidise educator wages.

Recommendations to target funding to drive outcomes

Governments can lift outcomes for children, especially those vulnerable and disadvantaged by:

Funding ECEC based on the real cost of quality delivery, drawing on data garnered through the ACCC review to identify the cost per age of child and additional costs due to factors such as location and vulnerability

Providing equity funding targeted at the additional costs of service delivery to support outcomes for vulnerable children in every community

Integrate investments into upskilling with paid practicum to support ECEC workforce growth and professionalisation

Investing in co-funding improved wages and conditions to ensure ECEC wages and conditions are on parity with the school sector.



LIFTING QUALITY ACROSS THE SYSTEM

Quality in early childhood education care is measured at a national level through the National Quality Standards. Government and community managed early childhood education and care services are more likely to meet or exceed the national quality standards.

% Exceeding national quality standards' by 'Management type'



Data obtained from: Quarter 1 Quality Rating Progress (April 2023)

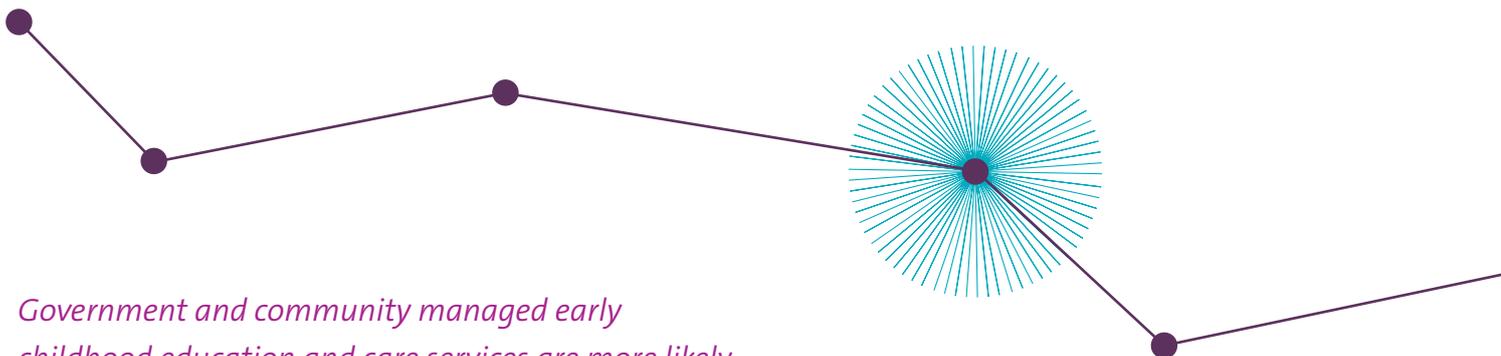
A large number of elements make up quality delivery – both process quality which looks at the individual interactions an educator has with children for example, and structural quality which includes ratios and infrastructure. Factors that drive quality can differ according to the characteristics of the cohort and location and size of services. Opposite is one example of how quality can be embedded across an organisation.

Glen Education – Quality across a network of 18 kindergartens

All Glen Education services for the last 10 years have been rated as exceeding, but this comes at a cost. Glen Education employs staff at levels that exceed minimum ratio requirements. They pay above award wages and have a well-resourced education team. Glen Education spend hundreds of thousands of dollars each year on infrastructure. Consistency in standards and support for staff is ensured by at minima a weekly visit to every service site by educational and management staff. Glen Education supplements the significant cost of operating through its fee-for-service activities.

Families must be able to rely on quality assessments, but the pace slowed during COVID. Data from ACECQA illustrates many services have not had quality assessments in the last five years (Percel, 2022). Additional funding is needed to regularly assess services. However the quality of assessments must also be consistent across the country (and within jurisdictions). Further, if we are to fund ECEC as a driver of children’s learning and development there must be consequences for services that continually fail to achieve a meeting standard.

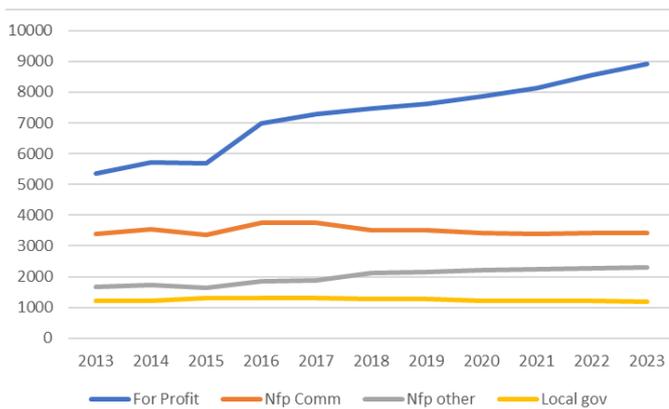
Government and community managed early childhood education and care services are more likely to meet or exceed the national quality standards.



Managing the market for quality

Low barriers to entry for ECEC impact quality. New providers regularly enter crowded markets and can result in closure of quality established services as parents may perceive newer facilities as more desirable and/or they may initially compete on price. Competition to operate services in areas that can command higher fees also inflates rents, making entry prohibitive to not-for-profit providers.

The graph below shows changes in ownership over the last ten years, with a growth in for profit ECEC provision and a flatlining of not-for-profit provision.

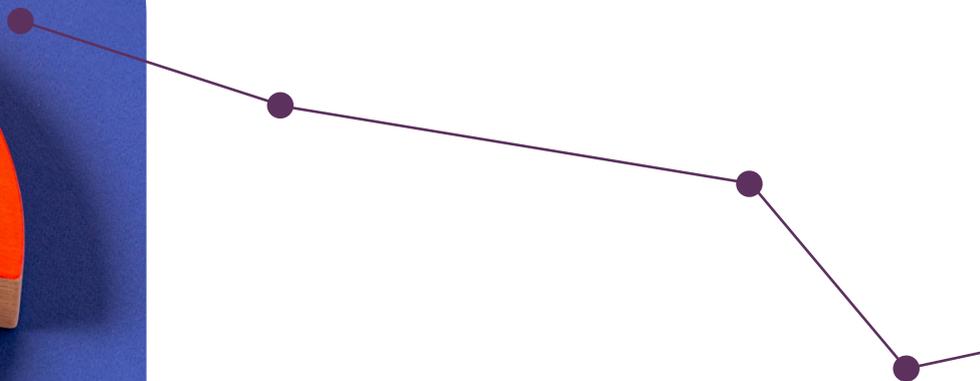
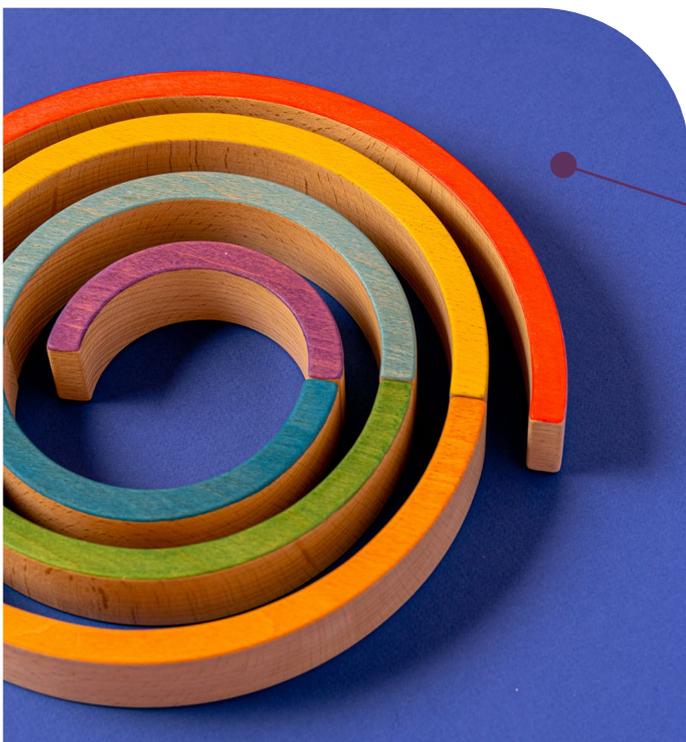


Data obtained from: ACECQA NQAITS quarterly data

Australia is not alone in this regard. New Zealand is embarking upon a new approach to managing the market through a Network Management approach. Under this approach providers must apply to open a new service and will be assessed against characteristics such as local demand, quality, viability and capacity to address priorities such as providing culturally diverse services, and meeting learning support needs of children (Education in New Zealand, 2023).

Managing the market is not sufficient as not for profit community services often lack access to capital necessary to expand. Governments seeking to maximise outcomes in ECEC, for example by investing in infrastructure to address ECEC deserts, should prioritise quality and children's outcomes and target additional investment at the community sector.

New approaches may be needed to support the community sector to grow its footprint. The community sector often relies upon volunteer governance to support the efficiency of operations, but this is not always sustainable given the necessary regulatory burden on ECEC providers. Innovative options exist, including employing directors and other administrative staff to reduce the burden on committees and ensuring tasks are not delegated to teaching staff. Other options include clustering providers together to provide a centralised model of operations.





New Models of ECEC Management – Early Years Management

Early Years Managers (EYM) are organisations that lead and manage at least three kindergartens and/or other ECEC services in Victoria. They provide professional management across a range of services. The move towards EYM is designed to reduce the management and administrative burden on volunteer committees and provides additional organisational support so kindergartens and teachers can engage in quality improvement and adopt contemporary practices. Most EYMs provide a variety of services, including playgroups and occasional childcare, many are part of organisations that deliver other services such as family support and allied health. As larger organisations, they are able to scale and take on additional services where infrastructure exists, for example meeting the needs of local governments for service providers in local council facilities. Children benefit from the inclusive services and evidence based best-practice models (Victoria State Government, 2016).

For more see: <https://www.vic.gov.au/early-years-management>

Recommendations to lift quality across the system

Governments can lift quality across the system by:

Managing the market, for example by examining the New Zealand approach and limiting the capacity of services and providers to grow unless they meet or exceed the national quality standard

Ensuring services that do not meet the National Quality Standards are rated annually, and all other services every three years, further strengthening the consistency and regularity of rating against the NQS

Supporting the community sector to develop and grow through infrastructure investment, including funding innovative solutions to drive growth

CONCLUSION

ELAA urges the Productivity Commission to observe our recommendations to create an ECEC system that is equitable and efficient. The recommendations have different levels of complexity and cost implications. Implementation of the recommendations needs to be staged to align with current reviews and build system capacity.

A range of recommendations can be implemented in the short term, within the next twelve months, to increase access to early childhood education and care.

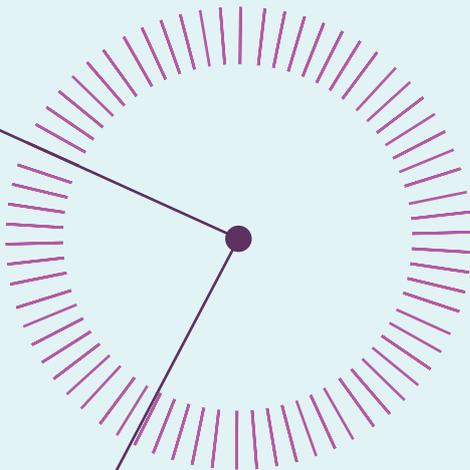
Recommendations to be implemented in the next twelve months

The key short-term recommendation is to enable access to the Child Care Subsidy to kindergartens and preschools for hours of delivery outside of funded preschool programs. This initiative would provide thousands of additional places for children without the need for additional infrastructure builds by efficiently using existing infrastructure and workforce. The Family Assistance Act would require amending in order to remove the current prohibition on accessing Child Care Subsidy if the majority of your enrolments are preschool-aged children.

Removing the Activity Test is a key measure to enable over 120,000 vulnerable families to enrol children in subsidised ECEC for more than one day per week, and is a key equity measure as well as a long-term investment in improved educational outcomes.

Co-investment in educator and teacher wages is an urgent short term and ongoing investment to ensure that a quality workforce is built and retained to secure children's educational outcomes. Alongside this, funding for upskill both to diploma and bachelor level needs to meet projected skill needs and include support for the costs of training including wages during placement.

The current ACCC inquiry provides the opportunity for government to examine and re-orient the funding model for ECEC providers to ensure that funding matches the cost of quality delivery, including providing equity funding to meet the education needs of different children by vulnerability and location. This should include consideration of subsidy levels for vulnerable families to reduce barriers to access, such as universal free ECEC for families on Health Care Cards. Consideration of models to fund and regulate transport, especially in rural and remote areas, must be factored into this to ensure all children can access ECEC.



CONCLUSION *(cont.)*

Recommendations to be implemented in the next two years

Several recommendations require a longer lead time to consult and design initiatives. This includes consideration of outreach and linker programs that can operate across Australia and ensure all children can access early childhood education and care.

The current Inclusion Support Program Review may yield insights into how the program could be broadened to support the engagement, enrolment and participation of a broader range of children including children from language backgrounds other than English and children with a disability who are currently underrepresented in ECEC.

Investment in regular, consistent quality assessments across Australia, including processes for services that continue to not perform to meeting standards, need to be developed over the medium term to drive quality improvement in the sector.

Reframing the Community Child Care Fund to focus on co-funding investment in wrap around service delivery will require liaison with state and local governments, to develop the best mechanisms to identify and work in partnership with other funding bodies.

Recommendations to be implemented in the next five years

The Government should examine the New Zealand model of market management, with a view to implementing a more managed approach over the next five years. A sufficient lead time is required to work across jurisdictions and develop an approach that will suit the Australian context, and ensure sufficient stock of quality ECEC is supported.

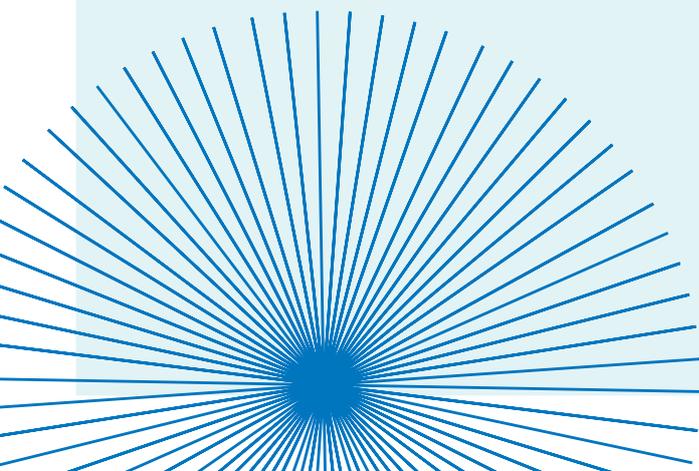
The Government should work with state and territories to secure a national approach to providing two years of preschool. Given the different starting points of jurisdictions, a longer lead time is needed for this initiative.

A centralised enrolment process would make enrolment in ECEC simplified for families and strengthen the ability to engage vulnerable families in ECEC. There are significant complexities in exploring how a scheme/s could operate in different geographies and requires exploration and consideration in line with expanding the sector to provide additional places.

We know ECEC sets children up for life, and that the children who will most benefit currently face the greatest barriers to attend.

Governments must fund equity and quality, to enable the right conditions for all children to access ECEC, with a view to mandating high-quality, play-based preschool in the two years before school.

Drawing on our recommendations, the government can maximise its investment in children, families, the workforce and the economy. Our recommendations will shape an efficient, high quality and sustainable system that delivers outcomes to children and families immediately and sustains this through improved education and lifelong outcomes.



GLOSSARY

Child Care Subsidy (CCS):

Assistance to help cover the cost of ECEC

Additional Child Care Subsidy (ACCS):

Access to a higher rate of CCS for certain categories of claimants including grandparents, parents transitioning to work, children with additional vulnerabilities or families experiencing temporary financial hardship.

The Australian Children's Education and Care Quality Authority (ACECQA):

The independent national authority that assists government in overseeing the National Quality Framework for children's education and care.

Early Childhood Education and Care (ECEC):

Australia ECEC sector which made up of different delivery setting including out of school hours care, occasional care, family daycare, long daycare and preschool/ kindergarten.

Kindergarten Inclusion Support (KIS) Funding:

Additional funding for funded Kindergartens from the Victorian Government. This funding allows services to build programs that are inclusive for children with individual disabilities or medical needs.

Inclusion Support Program (ISP):

Federal funding which helps services to expand programs and acquire equipment to better aid children with additional needs to actively participate in ECEC.

Central Registration and Enrolment Scheme (CRES):

A Victorian scheme which is partially state funded with participating local councils managing enrolments for multiple services through one common enrolment process and allocating places based on demand and priority of access.

Ratios:

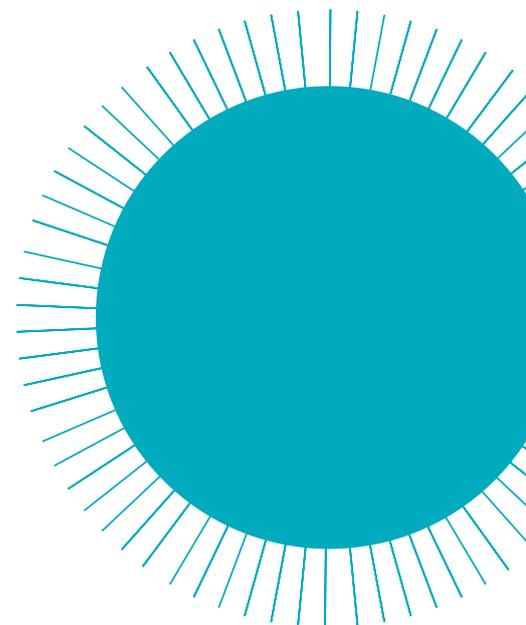
The number of students to teacher in the classroom. The current ratio for 3- and 4-year-olds is 1 teacher to 15 children.

The National Assessment Program Literacy and Numeracy (NAPLAN):

A series of tests focused on basic skills that are administered to Australian students at year 3,5,7 and 9.

National Quality Standard (NQS):

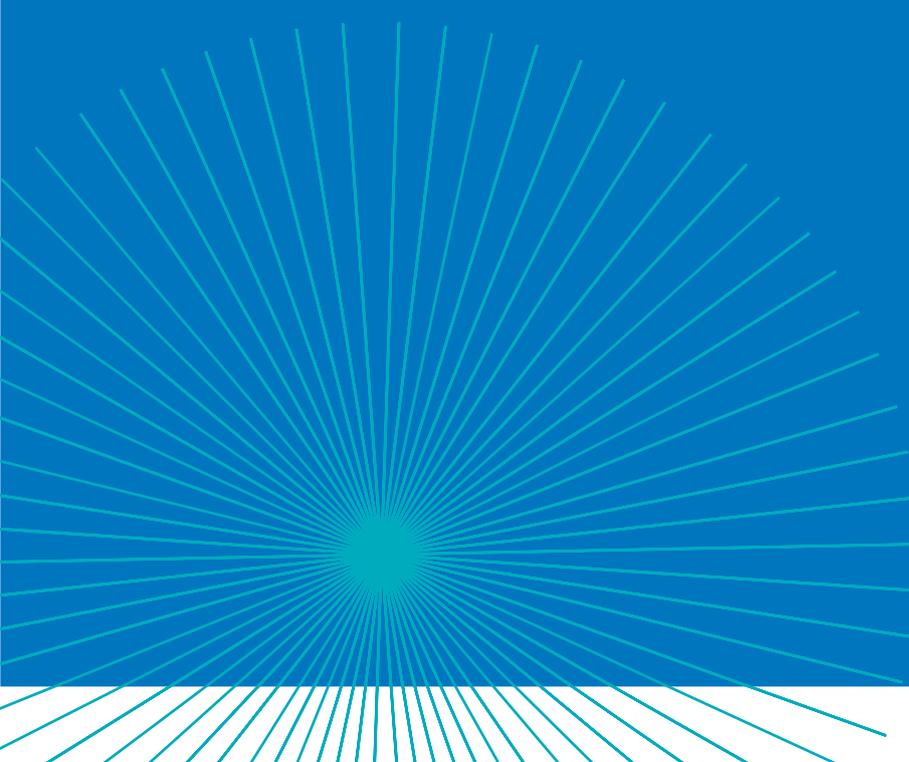
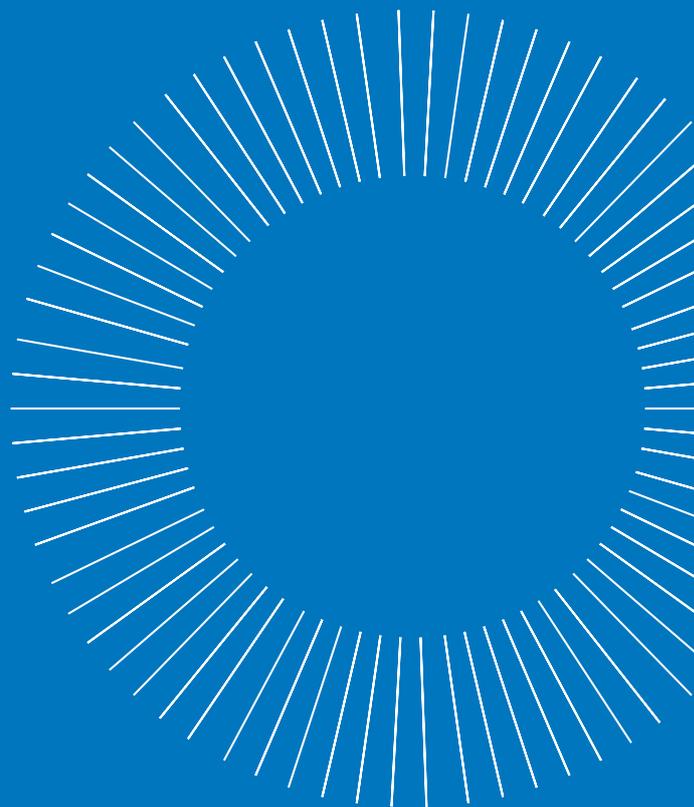
A national benchmark which services are assessed against. The NQS gives every service a rating based on an evidence backed National Quality Framework (NQF). The NQS applies to all ECEC services as well as outside of care hours across Australia. Thin Markets: Areas with little to no access to ECEC services.



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