



Early Learning  
& Care Council  
of Australia

**ELACCA submission  
in response to the  
Australian  
Government Early  
Years Strategy  
Discussion Paper**

April 2023



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The Early Learning and Care Council of Australia (ELACCA) welcomes the opportunity to submit our response to the Early Years Strategy.

## About ELACCA

The Early Learning and Care Council of Australia (ELACCA) was established to promote the value of quality early learning and care as an integral part of Australia's education system. Our 19 CEO members include some of the largest early learning providers in the country, representing both not-for-profit and for-profit services.

ELACCA members operate 1,984 long day care services, 310 preschool/kindergarten services and 92 OSHC services, covering every state and territory. They offer one-quarter of all the early learning places in Australia. Together, our members serve 369,776 children and their families, and employ more than 56,708 staff.

As well as promoting the value of quality early learning and the need for greater public investment, ELACCA advocates for the right of all children to access quality early learning and care, particularly children facing disadvantage. We do this by drawing on the knowledge and practical experience of our members and representing their views to decision makers in government, the media, and the public.

## Development of an Australian Government Early Years Strategy

ELACCA welcomes the development and implementation of an Early Years Strategy from the Australian Government. Drafting of the Strategy provides an opportunity to articulate strategic intent to achieve the best possible outcomes for the youngest Australians. The Strategy should enable and facilitate better cohesion between Government Departments and Ministerial portfolios.

ELACCA also advocates for a multi-jurisdictional approach to the early years with collaboration across States, Territories, and the Australian Government, ideally overseen and supported by National Cabinet. National consistency across jurisdictions remains an ongoing challenge for the sector, and the Strategy provides an opportunity for this to be strengthened. The Strategy provides an opportunity for greater alignment of policy and operations, and to ensure that every Australian child has the same entitlement to the best possible start in life, no matter what state or territory they live in, or what their family circumstances are.

ELACCA strongly encourages the Strategy to provide the basis and pathway for streamlining early learning, disability, health and wellbeing services across the early years, ensuring genuine inclusion and support for all children, families and communities. ELACCA hopes that all levels of government align policy and funding to partner with professionals and parents and provide the best possible first five years in every child's life. The early learning and care sector provides a steady and proven platform to support these outcomes and can be leveraged and resourced to play a proportionate, fundamental, universal role in delivering an Early Years Strategy over the next decade and beyond.

# Recommendations for the Early Years Strategy

ELACCA recommends the Australian Government consider the following actions:

## ***Data, evaluation and measuring impact***

1. Build processes to collect, safely house and analyse real-time data, to:
  - (a) contribute to a national evidence base informing future policy and funding decisions and
  - (b) measure social and economic impact leading to continuous improvement.

## ***Access and equity***

2. Ensure every Australian child be entitled to up to 5 days per week of quality early learning, in the service type of their choice, enabling continuity of relationships through a child and family centred focus.
3. Connect with First Nations families and communities, and First Nations-controlled organisations to ensure culturally safe, strong and appropriate policy settings for Aboriginal and Torres Strait Islander children.

## ***Support a strong and stable early learning workforce***

4. Fund a pay raise for the early learning and care workforce, and invest in targeted workforce initiatives to attract, retain and reattract quality early childhood educators and teachers, including:
  - (a) Targeted scholarships, free vocational education and training and school-based traineeships.
  - (b) Attract and attract back campaigns and initiatives co-designed with peak bodies and the sector.
  - (c) Careers education initiatives that promote the value and importance of the early learning workforce.
  - (d) Opportunities to be supported to upskill within the sector.

## ***Inclusion support that streamlined, with targeted wrap-around services***

5. Carefully consider universal access and equity in the design and implementation to ensure hard to reach, vulnerable and disadvantaged children and families benefit from unstigmatised services for their child in the early years, including:
  - (a) early learning and care,
  - (b) disability support and
  - (c) early intervention and other wrap-around support services.

These services require adequate funding, with immediate additional funding support and reform to be made available via the Inclusion Support Program, and Additional Child Care Subsidy.

6. Partner with the sector and philanthropy to trial and prove concepts for innovative, place-based and fully integrated services for children and families, across health and wellbeing, early learning and care, disability services and other early years services.

## ***Joined-up policy development and implementation***

7. A cross-Government, multi-jurisdictional approach to the development and implementation of the Early Years Strategy, overseen by and accountable to National Cabinet.
8. Establish clear, transparent governance and accountability arrangements, with clearly identified lead and supporting portfolio Ministers, and Government Departments.
9. Establish mechanisms for parents/carers and children to be empowered in the design and implementation of early years policy and processes.
10. Work with each sector to re-design early years systems to be:
  - (a) streamlined and simplified, reducing red-tape and duplication, and addressing funding delays, shortfalls and unnecessary complexities.
  - (b) genuinely joined-up with no 'wrong doors' for families with young children to access any and all support required.

## A national vision for the early years

The Strategy should clearly articulate an ambitious vision for Australia's youngest children. Though the Strategy is broader in scope, it should align with the National Vision for Education Childhood Education and Care currently being developed by National Cabinet<sup>1</sup>.

From an early learning perspective, it is imperative that the Strategy recognises that all children be entitled to access affordable, quality early learning and care, supported by a quality, qualified and appropriately valued workforce. Family income or engagement in the workforce should never present a barrier to access.

ELACCA supports an aspirational and ambitious vision for Australian children in their first five years that also encompasses:

- all babies and children are valued and nurtured in a healthy and safe environment to grow
- proportionate and universal access to care and support for children's optimal health, wellbeing, learning and development
- all children grow and learn in culturally safe environments where all types of diversity are celebrated
- an early years system that recognises, and responds with additional support, children and families facing hardship, vulnerability and/or disadvantage.

In developing a vision for the Strategy, the United Nations Convention on the Rights of the Child (UNCRC) should be considered, which includes: the right to life, survival and development, health, adequate nutrition, economic security, a healthy and safe environment, education and play<sup>2</sup>.

## Key outcomes to be enabled by an Early Years Strategy

Informed by a strong and ambitious vision statement, the Strategy must include a range of outcomes or goals for young children, with particular regard to their health, wellbeing, learning and development.

Informed by the OECD Aspirational Child Well-being Measurement Framework<sup>3</sup>, suggested the following high-level outcomes from the Strategy:

1. Children are at optimal physical and mental health, with additional support accessible when it is needed, for as long as required.
2. Families are supported to provide a safe and nurturing material environment for their children.
3. Children's social, emotional and cultural development is fully realised.
4. Children have access to up to five days of quality early learning and care, regardless of where they live, or what their parents do.

These outcomes for the system should also be underpinned in the Strategy:

5. An effective, easily navigable national early years system is joined up, streamlined and adequately resourced to support all Australian children in their first five years and beyond.
6. Government Departments collect and provide access to real-time high-level early years system data to ensure ongoing evaluation of policy, framework and funding responses, and promote best practice and continuous improvement across systems.

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<sup>1</sup> DESE (2023), *National Vision for ECEC*, <https://www.education.gov.au/child-care-package/strategy-and-evaluation/national-vision-early-childhood-education-and-care>

<sup>2</sup> *Convention on the Rights of the Child* (Adopted 20 November 1989) General Assembly resolution 44/25 <https://www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child>

<sup>3</sup> <https://www.oecd.org/wise/measuring-what-matters-for-child-well-being-and-policies-e82fded1-en.htm>

7. Government Departments and jurisdictions developing and implementing aligned policy and processes across portfolios with clear Ministerial responsibility identified and clear, transparent governance and accountability arrangements.

ELACCA also strongly supports any specific outcome/s developed in direct consultation with First Nations communities and First Nations-controlled organisations to support the best start in life for Aboriginal and Torres Strait Islander babies and children, to ensure culturally safety and self-determination.

## Improved outcomes for children and families facing vulnerability and/or disadvantage

As highlighted in the Discussion Paper, high quality early childhood programs for children experiencing disadvantage, and/or vulnerability, can yield returns of between \$4 and \$16 for every \$1 invested<sup>4</sup>.

The Australian Early Development Census provides evidence that many children are starting formal schooling lagging up to 2 years behind their peers, with that gap most likely to grow rather than diminish with time. The percentage of children with two or more developmental vulnerabilities in Australia 11.7%.<sup>5</sup>

Supporting early intervention within universal services is particularly important for children experiencing vulnerability and should be a key focus for Commonwealth investment. On many levels, early learning settings are the universal platform for children five and under. Warm referrals for higher needs children and families from early learning services to wrap-around services, allied health professionals and other scaffolding support should be considered as part of this Strategy. Noting that our sector is facing significant workforce challenges, this additional and critical role would need to be appropriately resourced by the Australian Government.

### *Inclusion support*

Quality differs across different cohorts of children, and should be acknowledged in how services are funded. Inclusion funding to support children and families with additional needs falls far short from what is required to adequately support vulnerable and/or disadvantaged cohorts. Increased funding to support children and families, in the most streamlined and accessible process possible, would be an impactful improvement the Commonwealth could implement.

Further, early childhood services located in very remote areas, or those with a high proportion of families and children experiencing vulnerability and/or disadvantage require a higher level of resourcing, including funding to attract, house and provide transport for degree qualified early childhood teachers. Growing each community's own qualified educators and teachers, should be a priority for remote services.

Innovative programs for targeted or hard to reach communities should also be considered, for example recognising and harnessing culturally safe practices through scholarships for the First Nations workforce. Scholarships, professional development and a two-way learning exchange for Indigenous and non-Indigenous workforce could be explored, in conversation with First Nations people.

Intensive support and proportionate universality that enables all children to have access to quality is acknowledged and required. Additional resources must be available in a timely and responsive manner, and enablers and barriers addressed to ensure equitable and transformative access for all children. Funding for dedicated family outreach staff in early learning settings, with the capacity to offer soft entries or 'warm referrals', should be considered to increase access for hard to reach children.

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<sup>4</sup> Heckman, J (accessed 2022) *Invest in Early Childhood Development: Reduce Deficits, Strengthen the Economy*, heckmanequation.org, Nd

<sup>5</sup> Australian Government (accessed January 2023), AEDC Percentage and number of children developmentally vulnerable in 2021, <https://www.aedc.gov.au/data-explorer/>

## *Integrated child and family services*

Integrated child and family services are an excellent example of innovative program and service delivery. Noting there is an important distinction between an integrated building, and an adequately funded, high functioning, integrated service. Recent research (2021) into integrated child and family services has demonstrated that they have significant potential to meet many of the key needs of children experiencing diverse vulnerabilities and their families.<sup>6</sup>

## *Place-based approaches*

Place-based approaches that target and respond to different cultural needs and environments should be considered to ensure quality offerings to children who are hardest to reach, but have the most to gain from a quality early learning.

Government could also consider partnering with philanthropy to trial innovative solutions to integrated child and family services. Our Place in Victoria is a partnership between the Victorian Government and the Colman Foundation, offering place-based approach to supporting the education, health and development of all children and families in disadvantaged communities by using school as the universal platform<sup>7</sup>.

Some additional state-based examples for consideration include: Your Town program in Playford<sup>8</sup> supporting families with children experiencing trauma-related challenges, and Goodstart Early Learning's partnership with Flinders University's Health2Go<sup>9</sup>. This initiative in the Adelaide metropolitan area supports the detection of developmental delays and other health concerns in children from vulnerable or disadvantaged backgrounds. A similar developmental screening program has recently been announced by the NSW Government<sup>10</sup>.

## **Strengthening Commonwealth coordination and collaboration**

ELACCA would welcome integrated, child and family-centred approach from the Commonwealth – with an increased capacity for parents and carers to seamlessly access services provided across Departments/portfolios.

System integration at a Commonwealth level would allow families, providers and other key stakeholders to more easily navigate 'the system'. Clear communication, easily navigable websites and key contacts would be welcomed, improve the experience for families with young children. Devolved decision-making for access to Commonwealth-funded services (for example, ACCS) would better streamline access to services and ensure those most vulnerable cohorts of children, who have the most to gain from services like early learning and care, don't miss out.

Initiatives like the Victorian Government's School Readiness Funding (SRF) Menu provide the sector with much-needed coordination with allied health services. The menu offers the early learning sector with real time options for evidence-informed programs and supports addresses the 3 priority areas for SRF<sup>11</sup>:

- communication (language development)
- wellbeing (social and emotional)
- access and inclusion.

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<sup>6</sup> Moore, T.G. (2021). Core care conditions for children and families: Implications for integrated child and family services. Prepared for Social Ventures Australia. Parkville, Victoria: Centre for Community Child Health, Murdoch Children's Research Institute, The Royal Children's Hospital. <https://doi.org/10.25374/MCRI.14593878> Moore, T.G. (2021). Developing holistic integrated early learning services for young children and families experiencing socio-economic vulnerability. Prepared for Social Ventures Australia. Parkville, Victoria: Centre for Community Child Health, Murdoch Children's Research Institute, The Royal Children's Hospital. <https://doi.org/10.25374/MCRI.14593890>

<sup>7</sup> <https://ourplace.org.au/>

<sup>8</sup> Your Town (accessed January 2023) [Early Childhood Development Program | Elizabeth | yourtown](#)

<sup>9</sup> F. Lucas 'Goodstart partners with Flinders Uni to strengthen developmental screening in ECEC (thesector.com.au)', *The Sector*, 14 June 2022

<sup>10</sup> New South Wales Government (28 November 2022) [Free development checks to give NSW kids the best start in life | NSW Government](#)

<sup>11</sup> <https://www.vic.gov.au/school-readiness-funding-menu>

Regular formal and informal engagement with other layers of Government (state and local), peak and industry bodies would also be beneficial in developing policies for children and families. It is acknowledged that children's voices should also be heard when developing policy that relates to them.

National consistency in the early learning and care sector remains an issue, with families entitlement to affordable, quality early learning and care differing across states and territories. An immediate action the Commonwealth could take would be to ensure state and territory adherence to ACECQA's National Quality Framework and National Quality Standard. In addition, and of relevance to quality, ensuring consistency in early childhood teacher qualifications and a national teacher registration process, nationally acknowledging ACECQA determinations, is vital for our sector.

To support planning and high-level data collection and analysis, the sector would also benefit from a nationally consistent online data system, leveraging approved third-party software providers and housed by ACECQA who already have data linkages to services across Australia. ELACCA has advocated for this and will continue discussions regarding its merit with the Australian and State/ Territory Governments.

A cross-Government, multi-jurisdictional approach to the development and implementation of the Early Years Strategy is supported by ELACCA, overseen by and accountable to National Cabinet.

## Policy priorities in an Early Years Strategy

ELACCA is focussed on using our scale and reach to lead exceptional early learning outcomes for all our youngest Australians. To this end, the policy priorities we are focussed on related to early learning and care.

### *Data, evaluation and measuring impact*

Access to timely and accurate data is an important enabler for assuring a quality early learning system, by targeting resourcing and intervention, and learning where to leverage success.

A high-level national dataset that leverages and expands on children's days/time of attendance, workforce and quality ratings should be developed and maintained by the Commonwealth, in partnership with states and the sector to enable strategic policy, modelling and interventions through real time evidence.

Further, consideration should be given to develop and enhance national administrative data to assess the quality, and support the delivery of, national integrated supports and services.

The Strategy should establish robust systems of monitoring and evaluation across Government, and transparent reporting mechanism, accessible to families, industry and policy-makers.

### *Recommendation:*

- *Build processes to collect, safely house and analyse real-time data, to:*
  - (a) *contribute to the evidence base informing future policy and funding decisions and*
  - (b) *measure social and economic impact leading to continuous improvement.*

### *Access and equity*

Ensure access to high quality early learning and care, regardless of sector type or geographical location, including adoption and commitment to nationally consistent quality measures, programs and assessment and rating.

The current activity test within the Commonwealth's Child Care Subsidy, and eligibility processes to the Additional Child Care Subsidy create barriers for families, including those that may be experiencing disadvantage and/or vulnerability.

Government policy payment systems must be re-designed in consultation with the sector and families to eliminate barriers to accessing early learning and care, for the number of days each family or child requires, particularly for families experiencing vulnerability and/or disadvantage.

Equity and access be considered in the design and implementation to ensure hard to reach, vulnerable and disadvantaged children and families benefit from early learning, including:

- a. barriers to attending early learning actively identified and removed.
- b. inclusion support funded adequately, including provision of outreach staff.
- c. place-based integrated children and family services are established.

*Recommendations:*

- *Ensure every Australian child be entitled to up to 5 days per week of quality early learning, in the service type of their choice.*
- *Connect with First Nations families and communities, and First Nations-controlled organisations to ensure culturally safe, strong and appropriate policy settings for Aboriginal and Torres Strait Islander children.*

### **Support a strong and stable early learning workforce**

Optimal learning and developmental outcomes are of course clearly linked to the health, wellbeing and safety of children. Quality outcomes for children depend upon a highly skilled, well supported and professionally recognised workforce.<sup>12</sup>

The early learning and care sector is facing critical shortages— as at February 2023, ELACCA members (representing just over a quarter of early learning and care providers in Australia) reported 4,957 job vacancies – of the vacancies, 70% were for qualified early childhood educators, and 20% for degree qualified early childhood teachers.

ELACCA recommends investing in attracting and retaining a quality, appropriately valued workforce, with action linked to the existing national workforce 10-year strategy *Shaping our Future*<sup>13</sup>.

*Recommendation:*

- *Fund a pay raise for the early learning and care workforce, and invest in targeted workforce initiatives to attract, retain and reattract quality early childhood educators and teachers, including:*
  - (a) *Targeted scholarships, free vocational education and training and school-based traineeships.*
  - (b) *Attract and attract back campaigns and initiatives co-designed with peak bodies and the sector.*
  - (c) *Careers education initiatives that promote the value and importance of the early learning workforce.*
  - (d) *Opportunities to be supported to upskill within the sector.*

### **Inclusion support that streamlined, with targeted wrap-around services**

Ensure that inclusion support is appropriately resourced, and easily accessed at the time that is needed, so children with additional needs, or who face vulnerability and/or disadvantage face no barriers in accessing early learning and care, including removal of unnecessary red tape, and provision of portable support for smooth transitions between sectors, and key milestones, including moving from early learning to school.

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<sup>12</sup> Australian Children's Education and Care Quality Authority, "Shaping Our Future" A ten-year strategy to ensure a sustainable, high-quality children's education and care workforce 2022–2031 <https://www.acecqa.gov.au/sites/default/files/2021-10/ShapingOurFutureChildrensEducationandCareNationalWorkforceStrategy-September2021.pdf>

<sup>13</sup> <https://www.acecqa.gov.au/national-workforce-strategy>

As the universal platform in the early years, consideration could be given to provision of additional resources in the early learning sector to support families to navigate 'the system', to build awareness of support available and ensure families receive all support their child is entitled to. The capacity of children to receive treatment from allied health professionals within their early learning setting can also be of considerable benefit to the child and family. The early learning setting provides a familiar and inclusive setting for allied health interventions and enables capacity building of the early years workforce that supports children's unique developmental needs.

Streamline services and support to ensure families with high or complex needs are not required to tell their story on multiple occasions, and can access support when it is needed (without delay).

Integrated service models, place-based approaches and other innovative models provide streamlined, wrap-around services are an important improvement to the sector, and ELACCA would welcome this as a key policy priority in the Strategy.

*Recommendations:*

- *Carefully consider universal access and equity in the design and implementation to ensure hard to reach, vulnerable and disadvantaged children and families benefit from unstigmatised services for their child in the early years, including:*
  - *early learning and care,*
  - *disability support and*
  - *early intervention and other wrap-around support services.*

*These services require adequate funding, with immediate additional funding support and reform to be made available via the Inclusion Support Program, and Additional Child Care Subsidy.*

- *Partner with the sector and philanthropy to trial and prove concepts for innovative, place-based and fully integrated services for children and families, across health and wellbeing, early learning and care, disability services and other early years services.*

**Joined-up policy development and implementation**

For the Strategy to be successful it is imperative that Government strengthens leadership accountability, and governance across the early childhood system at a national level, with clear delineation of Ministerial and Department responsibility and transparent reporting arrangements.

ELACCA advocates for the development of collaborative, cross-portfolio initiatives and integrated service development and delivery of policy and funding initiatives across the early years. This will best enable policy design featuring integrated, multi-disciplinary support for young children and allow Government to sequence targeted, collaborative, strategic research to best inform investment in initiatives to enhance the outcomes for children in their first five years.

*Recommendations:*

- *A cross-Government, multi-jurisdictional approach to the development and implementation of the Early Years Strategy, overseen by and accountable to National Cabinet.*
- *Establish clear, transparent governance and accountability arrangements, with clearly identified lead and supporting portfolio Ministers, and Government Departments.*
- *Establish mechanisms for parents/carers and children to be empowered in the design and implementation of early years policy and processes.*
- *Work with each sector to re-design early years systems to be:*
  - *streamlined and simplified, reducing red-tape and duplication, and addressing funding delays, shortfalls and unnecessary complexities.*
  - *genuinely joined-up with no 'wrong doors' for families with young children to access any and all support required.*

## Key principles

ELACCA welcomes the opportunity to inform key principles underpinning the Early Years Strategy.

We propose the following six overarching principles for consideration:

1. The rights and best interests of all children, and their families, are at the centre of all we do.
2. Cultural safety, identity and diversity are defended and championed in all early childhood services.
3. Services and supports to children and their families should be universal, joined-up and easy to navigate.
4. Proportionate universality is the key feature of how services are designed, resourced and delivered – acknowledging that some children and families will need additional support within services and without stigma.
5. Early childhood policy is informed by evidence and best practice and evaluated for impact and continuous improvement.
6. The system works in partnership, across Government Departments, jurisdictions and the sector, and with families and communities.

The early learning and care sector is under-resourced and facing huge workforce challenges, but provides a platform for coordination and collaboration with other components of the early childhood system. And as the platform, the highest value intervention the Government could make to stabilise the sector and assure workforce supply is to improve pay and conditions for early childhood teachers and educators.

ELACCA stands for quality early learning and care, supported by a quality, qualified and appropriately valued workforce, and we advocate that Government needs to fund an increase in wages for our workforce, to ensure an accessible, affordable early learning and care sector across Australia - now and into the future.

Many ELACCA members already pay above award rates, and opportunities for personal and professional development and other workforce programs and conditions. ELACCA advocates for our early learning workforce to receive pay parity commensurate with teachers and support staff in government primary schools.

## Gaps in existing frameworks and other research and evidence to be considered for the development of the Strategy

The Discussion Paper highlights the considerable number of strategies and legislation that will continue to interrelate with the Early Years Strategy.

Of particular importance from our sector will be the ability of the Strategy to consider and align with findings from the current Productivity Commission Inquiry into Child Care (Early Learning and Care) Sector, and the ACCC inquiry into the price of child care (early learning and care). Due to misalignment of timing, it is likely that the Strategy will need to be agile to respond iteratively to impending reform, particularly over the next 18 months.

In addition, the potential for an Indigenous Voice to Parliament provides an opportunity for genuine consultation on the Strategy and its implementation with First Nations people, which would be welcomed by ELACCA.

## Response to proposed structure of Strategy

ELACCA notes the proposed structure (outlined at Attachment B of the Discussion Paper), and suggests that a simplified structure and terminology is considered, to ensure the Early Years Strategy is accessible and easily understood.

ELACCA recommends the Early Years Strategy (the Strategy) adopt a framework similar with that recently delivered by the Government of Ireland in their *First Five: A Whole-of-Government Strategy for Babies, Young Children and their Families 2019-2028*<sup>14</sup>, which includes:

- an overarching vision, and four clearly articulated goals and a framework for action.
- interlocking objectives with strategic actions are clearly identified under each goal.
- six key principles that underpin the strategy.
- a framework for action that identifies lead Government Department for each action, and timeframe.

ELACCA supports the following components highlighted in the Discussion Paper:

- agreed principles and a strong and emerging evidence base should support the Strategy and all action and investment in the first five years.
- a genuine whole-of-Government approach and desire to break down silos. We recommend that lead and supporting Departments should be clearly identified in the Strategy to ensure clear accountability and inform efficient governance arrangements.
- a robust monitoring and evaluation framework to measure progress and impact is also a welcome inclusion to support the implementation and effectiveness of the Strategy.

## Conclusion

It is important that the Strategy is iterative and agile to ongoing reform across the early childhood system, particularly the outcomes from the Productivity Commission's inquiry into Early Childhood Education and Care.

ELACCA welcomes ongoing dialogue with relevant Departments, Ministers and Ministerial staff, as well as the Advisory Panel as the Strategy is developed.

Should the Minister/s or officials from the Department of Social Services wish to engage in direct consultation with our members, we would be pleased to facilitate a discussion with our CEO members. Please contact [REDACTED]

Thank you for considering our submission.

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<sup>14</sup> First Five: A Whole-of-Government Strategy for Babies, Young Children and their Families 2019-2028, <https://assets.gov.ie/31184/62acc54f4bdf4405b74e53a4afb8e71b.pdf>



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