

NATIONAL EARLY YEARS STRATEGY RESPONSE

1. Do you have any comments on the proposed structure of the Strategy?

It is difficult to comment specifically on the proposed structure in its current format as it is quite broad and high-level. It's encouraging to see though that it is focused on policy priorities and is driven by principles and evidence-based. Some critical components required to underpin the success will include:

- Additional resources – the success of this Strategy will be dependent on additional resources which include more than just funding (an overhaul to some of the Government department structures is required to provide additional support to providers).
- Further discussions with providers – it is important that the Government continues to obtain information from all stratum of the sector and across different geographic regions (we are an NFP and only operate in regional and remote areas in Tasmania and therefore provide a very different view from a large National or for-profit service operating in a metropolitan area or with only one type of service eg. Centre based).
- An understanding of all the ancillary services that currently exist along with the challenges they currently face
- Development of a unifying protocol or system which tracks key metrics and KPIs in relation to developmental outcomes and additional support needs that follow the child through different education and care services, ancillary support providers
- An awareness/education piece that helps families and other stakeholders to value and appreciate the sector as well as to understand the costs and challenges providers face (currently providers are the debt collectors on behalf of the Government as a result of the CCS system which leads to deterioration in relationships with families and bad debts which have an impact on service viability. Providers are also constantly attacked in the media with a continual focus on “childcare fees” rather than what’s actually driving those fees – including the significant compliance costs including legal fees to interpret various pieces of legislation and rising insurance costs in part due to increasing litigiousness of parents and highly punitive compliance action undertaken by State based regulators)

2. What vision should our nation have for Australia’s youngest children

The vision should be inclusive and agnostic towards geographic, financial, cultural and other barriers to ensure that children are given the best start in life and the greatest opportunity to succeed.

The vision should see children as capable participants in society and not as a resource we are “growing”. The vision should also focus on maximising opportunities for the best health and educational outcomes with an overall link to happiness and good quality of life into the future.

3. What mix of outcomes are the most important to include in the Strategy -

The challenge when prioritising outcomes at a national level is ensuring that they fit within the context at the local level and are responsive to local needs. It’s also important to ensure that providers are supported to deliver their requirements under the Strategy.

- Possible Outcome – an integrated system that supports children from conception to their middle years.
- Parents and families being engaged with services rather than just somewhere they leave their children whilst they do other things.
- Services are integrated from a family perspective and are tailored to their specific needs.
- Providers are appropriately resourced including through Governmental support mechanisms. Currently, at the Federal level, providers only have access to the CCS help desk which is calibrated to perform compliance tasks and has a specific focus on fraud. The CCS help desk is unable to provide any guidance to providers who are trying to comply with Family Assistance Law, and this means they are then required to seek costly independent legal advice (unlike the ATO where anyone can ring to get a binding ruling or advice to ensure they are compliant). There is also very little transparency with many different internal branches, and there are no help portals (staff are hidden behind internal emails and opaque staff directories).

4. What specific areas/policy priorities should be included in the Strategy and why?

The Strategy needs to include a focus on regional and remote areas as these areas require the most assistance and have the greatest barriers to access and success. Specifically, Family Day Care should be given greater consideration as it addresses many community needs and can be operated in locations where it may be unviable to build or run a centre-based setting.

The issue currently faced by approved FDC providers is that the increasing levels of regulation and red tape are deterring would-be entrants to the sector who then never have the opportunity to develop further or provide quality education and care. As an example, there was a recent review of the NQF, and one of the decisions taken through that consultation process (which is dominated by centre-based services) was to make it a mandatory requirement for FDC educators to hold at least a Certificate III in Early Childhood Education before they can commence as a Family Day Care Educator. They are no longer able to work towards this qualification whilst working, and this provides a large disincentive to would-be entrants who would then otherwise go on to gain further

qualifications. It's a large commitment for an individual to undertake without knowing whether they are going to enjoy the work whereas in other sectors and vocations, they can easily secure a trial period at the start of their employment also many vocations have an apprenticeship system which allows inexperienced new workers to earn while they learn on the job. This has been implemented on the basis of improving quality but has not been supported by any research or evidence which shows that holding a Certificate III improves any safety or quality outcomes for new FDC educators.

The majority of FDC educators have previously been engaged in informal care roles for other family members or friends and go through an extensive screening and induction process prior to commencing registration with an approved provider. The regulations have also changed over the years to place nearly all the compliance burden and responsibility with the approved provider so imposing this additional requirement as a mandatory, sector-wide requirement places would be FDC educators at a disadvantage in comparison to other vocations and acts as a great deterrent at a time when we have never needed their services more, especially in regional and remote communities.

Currently, a great deal of authority and decision-making sits with ACECQA, and whilst it is well-intentioned and on the surface appears to be focussed on improving quality in the ECEC sector, there are some flaws in the way in which the NQF has been implemented. Parents currently do not understand the rating system and a single issue, for instance, lack of community engagement, could see a service receive a "Working Towards" rating even if the service is exceeding in all other areas. Parents view this as a failure. This leads to services spending significant amounts of time explaining to parents what the rating means and sometimes results in parents needlessly doubting the ability of the service to educate and care for their children.

The Strategy also needs to address the current numeracy and literacy problems that are especially prevalent in regional and remote communities where parents may not have the skills themselves to educate their children in these areas (reading to them at bedtime and other leisure times) or knowledge or interest in books.

5. What could the Commonwealth do to improve outcomes for children—particularly those who are born or raised in more vulnerable and/or disadvantaged circumstances?

- Investigate and deeply analyse the reasons or factors that have created or significantly contributed to those disadvantaged circumstances.
- Implement cross-portfolio strategies to address the underlying social and economic conditions which have created the disadvantage in the first place (an investment in ECEC is an excellent start and whilst ECEC services are unable to ameliorate all the issues caused by disadvantaged and troubling home environments, they can provide

additional support and ensure that appropriate referrals are made to other services with intervention as a last but sometimes necessary outcome).

- Make it easier for different services to communicate with each other services about children (less red tape to ask another service if they are already working with a child) so they can work together for the child's benefit.

6. What areas do you think the Commonwealth could focus on to improve coordination and collaboration in developing policies for children and families?

- The Commonwealth Government should review the framework of having State government-based departmental staff enforcing the National Laws and National Regs as they often lack legal, audit or other compliance-relevant training. Whilst their National meetings seek to unify their approaches, this does not guarantee that they are adopting an approach which best meets the needs of local communities or the sector.
- Policies across sectors should be combined, for instance, Child Protection policy should not be duplicated. As an example at the start of Tasmania's COVID response in 2022 Services were reporting every case to the Department of Health as well as the regulator, this was later streamlined for one report which was passed on by the regulator, however, it has now reverted. A single report to a relevant public body should be able to be shared internally.
- The ECEC and primary school environments should be harmonised/brought closer to parity in how they are treated and viewed by the Government. That is, the National Quality Framework should be applied in primary school settings as they are the same children attending ECEC services and have the same needs in relation to quality education and care irrespective of where they are receiving that education and care. It doesn't make sense that there is such a chasm regarding regulatory requirements between the two settings (ratios, mandatory qualifications, incident reporting requirements, documentation requirements, assessment and rating process). This gap is also contributing to the skills shortage as the conditions are considerably more favourable in the primary school setting (student-free days, moderation days, significantly greater opportunities for student-free breaks throughout the day, shorter working hours, significantly more opportunities to take holidays throughout the year, greater training and professional development opportunities).

7. What principles should be included in the Strategy?

- Child-centred – listening to and responding to “children's voice”
- Evidence-based – including an examination of what is working well in other countries
- Collaborative – working with all key stakeholders including service providers
- Responsive to the environment – having consideration for sustainability as well as local context

- Allowing for diversity – different models and approaches work in different communities which provide varying contexts
- Adaptability – responsive to changes in the sector and Australia as a country

8. Are there gaps in existing frameworks or other research or evidence that need to be considered for the development of the Strategy?

Existing Frameworks

- United Nations Convention on the Rights of the Child
- United Nations Declaration of the Rights of Persons with a Disabilities
- United Nations Declaration of the Rights of Indigenous People
- ARACY NEST
- The Alice Springs (Mparntwe) Education Declaration

Other Research or Evidence for Consideration

There are currently no studies that measure or examine how the various educational qualifications (some of which are mandated) impact the quality of education and care provided.

It has also been assumed that a market-based approach will address the staffing shortfall through demand for education and care. However, a number of factors have created an untenable labour market situation where the standard setter (ACECQA) has mandated qualifications for the sector, but there has been no corresponding program to encourage entrants or indeed those already in the sector to pursue additional or even entry-level qualifications as they can attain better working conditions in other sectors without needing to undertake the qualifications and once they progress to a certain point it becomes more favourable for them to move into a primary education opportunity.

To be clear, we strongly encourage and support new entrants and existing staff to attain the relevant qualifications and progress as far as they can in their educational journeys with the hope that it will improve the quality of their education and care service delivery, however in practice, the personality and sector experience of an individual staff member goes a long way to determining the quality of education and care that they provide.