



Australian Council of State School Organisations Limited

Submission

To The

Productivity Commission

A path to universal early childhood and care

Draft report

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February 2024

*The national voice for families, carers, and communities in government education*

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Please indicate your name if an individual or your organisation name if you are responding on behalf of an organisation.

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The Australian Council of State School Organisations is a peak community organisation, and the  
*The national voice for families, carers, and communities in government education*

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## Introduction

The Australian Council of State School Organisations (ACSSO), as the representative voice for the families and communities of over 2.6 million students in Australia's government schools, appreciates the opportunity to respond to the draft report of the Productivity Commission's Early Childhood and Care Review. In our response, we have carefully considered the draft recommendations put forward by the Commission, using them as a focal point for our commentary and feedback.

Since our establishment in 1947, ACSSO has been at the forefront of advocating for inclusive, high-quality public education accessible to all Australian children, irrespective of their background. Our enduring commitment to promoting equality and accessibility in education is reflected in our belief that the primary responsibility of governments at all levels – federal, state, and territory – is to create educational environments that engage families and communities, deliver high-quality learning opportunities, and adapt to the changing educational landscape through diverse and flexible programs.

In addressing the draft recommendations of the Productivity Commission, we emphasise the transformative impact of quality Early Childhood Education and Care (ECEC) programs. We believe that effective ECEC programs are crucial in laying a solid foundation for a child's future education and social outcomes. Our submission to the original inquiry highlighted the importance of ECEC in fostering essential life skills such as social skills, self-confidence, coordination, creative thinking, and improved self-esteem. These early years are pivotal for a child's holistic development, as recognised by the United Nations Educational, Scientific and Cultural Organisation (UNESCO), and are instrumental in shaping lifelong learners and responsible future citizens.

Moreover, our response to the draft report acknowledges the economic challenges faced by many Australian families. The decisions around maternity or paternity leave and the balancing act of returning to work pose significant financial strains, impacting not just the individual families but the broader community as well. Our analysis of the draft recommendations includes a focus on how these economic factors intertwine with early childhood education and care.

We also address the need for a shift in policy perspective. It is crucial for policymakers to move beyond outdated perceptions and recognise the complexities involved in early childhood care. This understanding is essential for developing policies that genuinely support families and cater to the developmental needs of young children.

ACSSO's response to the Productivity Commission's draft report is a comprehensive reflection of our commitment to advocating for a holistic, inclusive approach to ECEC. We believe that the Commission's final recommendations should not only focus on educational outcomes but also consider the wider implications for family life and societal well-being. As the Commission continues its work, we urge a deeper understanding of these multifaceted aspects of early childhood education and care and look forward to contributing further to this vital conversation.

The “Path to Universal Early Childhood Education and Care” draft report appears to offer a comprehensive analysis of early childhood education and care (ECEC) in Australia, emphasising the need to address critical issues to transition towards a universal ECEC system. The report touches on various aspects of ECEC, highlighting challenges and proposing recommendations for improvement. From ACSSO's perspective, the following points identify key areas of the report and our response.



Draft recommendation: Support universal access in persistently thin markets via supply-side funding

ACSSO welcomes the recommendation to support universal access in persistently thin markets via supply-side funding. This initiative aligns with our commitment to ensuring that all children, regardless of their geographical location or socio-economic background, have access to quality ECEC.

The recommendation to provide additional support in markets where ECEC providers are less likely to invest is a critical step in addressing the gap in service provision, particularly in rural, remote, and underserved urban areas. We recognise that children in these communities are often the most in need of quality ECEC but have the least access. The proposed grant funding to establish services in communities capable of covering operating costs but not capital costs is a sensible approach. This will help in setting up essential infrastructure without imposing unsustainable financial burdens on these communities.

Furthermore, the provision of block grants to cover both capital and operating costs in communities where demand is low or access to childcare subsidies is challenging reflects an understanding of the complex barriers faced in these areas. Ongoing funding with periodic reviews will ensure that these services are not only established but are sustainable in the long term.

We are particularly supportive of the specific arrangements for Aboriginal Community Controlled Organisations. Co-designing these arrangements with Aboriginal and Torres Strait Islander communities, we believe, ensures that services will be culturally appropriate and meet the unique needs of these communities.

ACSSO acknowledges that the use of competitive tendering for service provision in markets without community grant applications is an effective way to ensure that services are provided by those best equipped to deliver quality ECEC. We hope that this would encourage a high standard of service provision while ensuring that all communities have access to these essential services.

The inclusion of centre-based day care, family day care, and mobile care in the funding considerations is commendable. This holistic approach takes into account the diverse needs and preferences of different communities, ensuring that the solutions are tailored and effective.

Lastly, establishing an advisory program to assist community representatives is a forward-thinking strategy. This will empower communities to navigate the complexities of establishing and maintaining ECEC services, ensuring long-term success and sustainability.

ACSSO strongly supports this recommendation. We believe it is a significant step towards equitable access to quality early childhood education and care for all Australian children. We look forward to collaborating with the government and other stakeholders in implementing these changes and witnessing the positive impact they will have on children, families, and communities across Australia.



Draft recommendation: Reduce barriers to educator upskilling.

ACSSO strongly advocates for the enhancement of professional development and support for upskilling staff within the ECEC sector. We urge the Australian Children's Education and Care Quality Authority (ACECQA) to elevate the standards and experiences required for obtaining an early childhood teaching qualification. This is pivotal in ensuring that educators are not only qualified but also well-equipped with the necessary skills and knowledge to meet the evolving demands of early childhood education.

Our support extends to the following key recommendations:

1. We advocate for the collaboration between universities and the ECEC sector to develop and promote accelerated degree programs. These programs are crucial for enabling diploma-qualified educators to efficiently advance their qualifications and become Early Childhood Teachers (ECTs).
2. The expansion of wrap-around support for educators undertaking university-level qualifications to become ECTs is essential. Such support should include guidance with enrolment processes, the enhancement of academic skills, and consistent mentoring. It is also important that these measures are subject to thorough monitoring and evaluation.
3. Providing financial support to ECEC services is critical. This support will allow services to offer paid leave to educators, aiding them in completing the necessary supervised professional experience for their early childhood teaching qualifications.

Furthermore, we endorse the additional proposals that:

- Universities should clearly communicate how prior ECEC qualifications will be recognised in their teaching courses, possibly through a median or average credit amount granted to students with ECEC backgrounds.
- ACECQA should conduct a detailed review of the supervised professional experience required for early childhood teaching qualifications under the National Quality Framework. This review should explore options for students to complete these requirements in their current workplaces, thereby integrating practical experience with academic learning.

We believe these recommendations are instrumental in fostering a more skilled, knowledgeable, and capable workforce in the ECEC sector, which will, in turn, elevate the quality of early childhood education across Australia.

Draft recommendation: Improve registration arrangements for early childhood teachers.

In addressing the draft recommendation regarding the enhancement of registration processes for ECEC practitioners, ACSSO recognises the distinct pedagogical methodologies inherent in both Early Childhood Education and Care and traditional school environments. These differences are foundational in the education and qualification process for professionals in each field.

ECEC's pedagogy, with its emphasis on play-based learning and developmental suitability, diverges markedly from the structured, curriculum-centric approach of primary and secondary education. ACSSO believes that integrating ECEC-qualified practitioners within the existing teacher registration framework as per current and emerging state and territory legislation is not conducive to Australia's educational welfare.

When a teacher registration board registers an individual, they are generally recognised as qualified to teach at various educational levels. However, this overarching qualification does not necessarily translate into proficiency in all teaching environments. Specifically, placing an ECEC practitioner in a role that demands teaching outside of their specialised field can be counterproductive. ECEC



practitioners are specifically trained to cater to the unique developmental needs of young children, focusing on both educational and emotional aspects. If such practitioners are tasked with teaching at higher levels, for which they are not specifically trained, it can adversely affect the educational outcomes and emotional well-being of the students in their care. This misalignment not only undermines the practitioner's expertise but also risks compromising the quality of education delivered to students outside the ECEC practitioner's specialised age group or subject area.

Instead, we propose a differentiated registration system for ECEC practitioners that respects and accommodates their unique pedagogical approach. This system would require specialised professional development and assessment protocols specifically designed to reflect the nuances of ECEC. Such a system would ensure that early childhood educators possess the specific skills and knowledge needed to deliver high-quality education and care.

ACSSO underscores the critical need for stringent and effective regulation in ECEC services. High-quality ECEC is vital for children's development and has substantial positive impacts on their educational and social trajectories. Ensuring that all ECEC services meet rigorous quality standards is paramount for the optimal care and education of Australia's children.

Effective regulation is essential for maintaining these standards, as it promotes accountability and fosters continual improvement in the services provided. In view of these factors, ACSSO advocates for sustained investment in the professional growth of ECEC staff, the fortification of regulatory frameworks, and the allocation of adequate resources for the enforcement of these standards. These strategies are crucial in ensuring that Australian children not only receive top-tier early education and care but are also well-prepared for future academic and developmental success.

*Draft recommendation: Lift support and mentoring for new early childhood teachers.*

ACSSO strongly supports the professional growth and development of new early childhood teachers. Recognising the challenges faced by educators at the start of their careers, we strongly advocate for enhanced support and mentoring programs tailored specifically for them.

Firstly, the transition from theoretical learning to practical application in an ECEC setting can be daunting for new educators. To ease this transition, ACSSO recommends the implementation of structured mentoring programs. Experienced educators can offer invaluable guidance, share best practices, and provide emotional support to new ECEC teachers. This mentorship should be a cornerstone of early career development, fostering a nurturing and supportive learning environment that encourages professional growth and confidence.

Secondly, continuous professional development is crucial for early childhood teachers to stay abreast of the latest educational practices and theories. ACSSO proposes regular, targeted training sessions and workshops for new educators. These sessions should cover a range of topics, from "classroom" management to innovative 'teaching' strategies and should be designed to address the unique challenges faced by early childhood educators.

Moreover, ACSSO suggests the establishment of support networks where new ECEC teachers can share experiences, seek advice, and collaborate with peers. These networks could be facilitated through social media platforms, regular meetups, or through professional associations. Such communities not only provide moral support but also serve as a valuable resource for sharing knowledge and best practices.

Finally, we emphasise the importance of well-being support for new ECEC teachers. The early years of teaching can be particularly stressful, and it's vital that educators have access to resources that



support their mental and emotional health. This might include access to counselling services, stress management workshops, and a supportive culture that prioritises the well-being of staff.

ACSSO believes that by investing in comprehensive support and mentoring programs, we can better equip new early childhood teachers to thrive in their roles, ultimately leading to a more effective and nurturing learning environment for our youngest learners.

*Draft recommendation: Improve pathways and support for Aboriginal and Torres Strait Islander people to obtain ECEC qualifications.*

ACSSO believes that improving pathways and support for Aboriginal and Torres Strait Islander people to obtain Early Childhood Education and Care qualifications is critical in fostering a culturally diverse and inclusive educational environment. The presence of Indigenous educators in ECEC not only provides role models for Indigenous children but enriches the learning experience for all children. It helps in promoting understanding and respect for Aboriginal and Torres Strait Islander cultures among non-Indigenous children from a young age.

Having Indigenous role models in the ECEC workforce is vital for several reasons. Firstly, it ensures that Indigenous perspectives, languages, and cultural practices are integrated into early childhood education. This integration is crucial for the development of a child's sense of identity and belonging, particularly for Aboriginal and Torres Strait Islander children. It helps them see their culture and heritage reflected and valued in their learning environment, essential for their self-esteem and educational engagement.

Secondly, Indigenous educators can better understand and address the unique needs of Aboriginal and Torres Strait Islander children. They can provide culturally responsive care and education, leading to better educational outcomes for these children. Having educators who share their cultural background makes Indigenous children feel more likely to feel understood, supported, and motivated to learn.

Moreover, increasing the number of Indigenous educators in ECEC contributes to the broader goals of reconciliation and social justice. It challenges and changes the existing narratives and stereotypes about Aboriginal and Torres Strait Islander peoples by showcasing their strengths, knowledge, and contributions in a significant sector like education. It also allows non-Indigenous children and educators to learn from Indigenous cultures, fostering a more inclusive and respectful society.

Therefore, ACSSO's position is that investing in pathways and support for Aboriginal and Torres Strait Islander people to gain ECEC qualifications is beneficial for Indigenous communities and Australian society as a whole. It is a step towards educational equity and a more culturally diverse and harmonious future.

*Draft recommendation: Contribute to professional development for the ECEC workforce.*

It's crucial for federal, state, and territory governments, *as well as for-profit ECEC centres*, to actively contribute to the professional development of the ECEC workforce for several compelling reasons.

Firstly, it's essential to ensure that ECEC educators are up to date with the latest educational research, methodologies, and best practices. Early childhood education is an ever-evolving field, and with new insights about child development and learning constantly emerging, it's important to invest in this area. By doing so, educators will be well-equipped with contemporary knowledge and skills, directly benefiting the quality of education and care provided to our children.





Secondly, professional development opportunities can lead to increased job satisfaction and retention rates among ECEC staff. When educators feel supported in their career growth and valued for their contributions, they are more likely to remain committed to their roles and institutions. This stability is beneficial for children, as it promotes consistent and secure relationships with their caregivers and educators, which is essential for their emotional and social development.

Thirdly, by facilitating professional development, both governments and for-profit ECEC centres demonstrate a commitment to maintaining high standards in early childhood education. This not only enhances the reputation of the ECEC sector but also assures parents and the community that children are receiving top-quality education and care. In the long term, this builds public trust and support for the sector.

Moreover, professional development can play a critical role in promoting inclusivity and diversity in ECEC settings. Training programs can focus on equipping educators with skills to create inclusive learning environments, understand diverse family backgrounds, and address the needs of children from various cultural and socio-economic backgrounds. This approach ensures that all children, regardless of their background, receive an equitable and enriching early education experience.

Lastly, governmental and private sector investment in professional development is a strategic move towards future-proofing the ECEC workforce. As societal needs and expectations change, so too must the skills and knowledge of those responsible for shaping young minds. By fostering a culture of continuous learning and improvement, the ECEC sector can remain agile and responsive to future challenges and opportunities.

In short, the contribution of federal, state, and territory governments, along with for-profit ECEC centres, to the professional development of the ECEC workforce is not just beneficial but essential. It ensures high-quality education and care, promotes job satisfaction and retention, builds public trust, supports inclusivity and diversity, and prepares the sector for future challenges.

#### Draft recommendation: Improve the ECEC Workforce Strategy

The success of any strategy depends on having a clearly articulated objective that is specific, measurable, achievable, relevant, and time-bound (SMART). This helps ensure that all actions taken are aligned with the strategy's overarching aim and that its effectiveness can be accurately assessed. Workforce projections are also crucial in effective planning and resource allocation and in identifying potential shortages or surpluses in the workforce. These projections should be based on robust data and consider factors such as population growth, policy changes, and sector trends.

A clear plan for resourcing the National Children's Education and Care Workforce Strategy is essential for the successful implementation of each action in the strategy. This includes financial, human, and material resources. Transparency in resource allocation builds trust among stakeholders and ensures accountability.

Annual updates on contributions to the strategy's implementation, reflecting on both successes and challenges faced during the implementation process, are crucial. Publishing these updates alongside the broader assessment by the Australian Children's Education and Care Quality Authority (ACECQA) provides a holistic view of progress and areas needing attention.

Collaboration and transparency among all stakeholders, including governments, ECEC providers, educators, parents, and communities, are key to ensuring that the strategy remains relevant and effective. Regular communication, sharing of best practices, and stakeholder engagement are necessary to achieve this.





The National Children's Education and Care Workforce Strategy should be a comprehensive plan aimed at meeting the current and future needs of the ECEC sector. It would achieve this by setting clear goals, projecting workforce needs, allocating resources appropriately, providing annual updates, and fostering collaboration and transparency.

*Draft recommendation: Modify the Child Care Subsidy to improve affordability and access.* ACSSO notes the important findings and recommendations regarding the affordability of ECEC for families with lower incomes, as presented in the draft report. The evidence presented underscores the unfair financial burden faced by families in the lowest income groups and the urgent need for targeted policy interventions to rectify these inequalities.

The report reveals a significant disparity in the amount of money spent on ECEC by families in the lowest 10% of the income distribution compared to those in the highest 10%. While the former spends about 9% of their income on ECEC, the latter only spends 5%, which is a stark indicator of inequality. This disproportionate financial burden on lower-income families not only limits their access to quality ECEC but also exacerbates broader socio-economic disparities.

We welcome the proposed changes to the CCS as outlined in the draft report, which includes relaxing the activity test for all families and lifting subsidies for lower-income families. These changes are crucial in ensuring that children and families most in need receive adequate support. Such targeted assistance can significantly contribute to reducing the financial strain on these families, thereby promoting more equitable access to quality ECEC.

The report's preliminary modelling indicates a 12% increase in total hours of ECEC demanded and a 3.4% increase in hours of work by single parents and secondary earners in couple families, which is encouraging. These changes can lead to substantial social and economic benefits, including increased labour force participation and support for the developmental needs of children from diverse socio-economic backgrounds.

While we recognise that implementing these changes will require a substantial increase in government outlays, it is essential to consider these costs as an investment in the future workforce and in reducing socio-economic disparities. The long-term benefits, including a more inclusive and equitable society and the development of a well-rounded, educated populace, far outweigh the immediate financial costs.

It is important to note that implementing broad-based changes to the CCS while reducing out-of-pocket expenses for all families may disproportionately benefit higher-income families. Therefore, we emphasise the need for policy options that specifically target support to those experiencing disadvantage. This approach ensures that government support is effectively directed towards improving access and affordability for families who stand to benefit the most from ECEC services.

The report's assessment of a universal 90% subsidy rate reveals significant increases in government outlays with minimal benefits for low-income families, who are already eligible for a high subsidy rate. This underscores the need for a more nuanced approach that prioritises support for those most in need rather than a one-size-fits-all policy.

ACSSO strongly advocates for policy reforms that specifically address the affordability challenges faced by lower-income families in accessing ECEC. While mindful of the financial implications of such reforms, we believe that providing targeted, equitable support in the ECEC sector is a critical investment in our children's future and the overall betterment of society.



Draft recommendation: Monitor rises in fees and out-of-pocket expenses.

The Australian Government's active and regular monitoring of fee changes and out-of-pocket expenses in ECEC centres, *particularly for-profit entities*, is a necessary and prudent measure. It ensures fairness, transparency, and accountability in a sector that is crucial to the development of our youth and the future workforce. By implementing a system to monitor and evaluate fee increases and requiring a regulatory response for unreasonable hikes, the interests of Australian families can be safeguarded, and the quality and accessibility of ECEC services can be maintained.

Regular monitoring of fees and expenses is essential to protect families from unjustified cost increases. While for-profit ECEC centres operate within a market economy, they must also recognise their role in providing an essential public service. The government's oversight will ensure that fee increases are aligned with the actual costs of providing high-quality care and education rather than being driven solely by profit motives.

A closer investigation into centres with markedly high fee increases could uncover detrimental practices that undermine the sector's overall quality and reputation. A regulatory response in cases of unreasonable hikes will not only protect consumers but also uphold the integrity and standards of the ECEC sector.

We agree that commissioning a detailed investigation into the costs and profits across the ECEC sector every three years is crucial. This approach, akin to the work undertaken by the Australian Competition and Consumer Commission, provides valuable insights into the financial dynamics of the sector. It helps in understanding whether fee increases are justified based on operational costs, including staff salaries, resources, facility maintenance, and quality improvement measures.

As identified in the report, such investigations will also inform whether the hourly rate cap needs adjusting. As economic conditions and operational costs change, the cap may need to be recalibrated to ensure it remains relevant and fair for service providers and families. This ensures that government support through subsidies and caps aligns with the current economic landscape.

Regular monitoring and investigations will indirectly encourage ECEC centres to adopt best practices in financial management and service delivery. Knowing that fees and profits are subject to scrutiny and comparison with sector norms, centres will be more likely to maintain reasonable pricing and focus on delivering high-quality care and education.

This data-driven approach will aid policymakers in making informed decisions regarding subsidies, rate caps, and other forms of government support. Thus, ensuring that public funds are used effectively and that government interventions in the ECEC market are justified and beneficial.

Draft recommendation: Make information about CCS eligibility easy to find and understand. ACSSO supports this recommendation and suggests that the Australian Government should prioritise improving the accessibility and comprehensibility of information about Childcare Subsidy (CCS) on government websites for families.

Draft recommendation: Improve the CCS calculator on the Starting Blocks website.

ACSSO agrees the Australian Government needs to improve the Childcare Subsidy calculator on the Starting Blocks website, supporting families to better estimate their eligibility for the subsidy based on different scenarios, and the government should explore ways to raise awareness about the availability of the calculator on the website.



**Draft recommendation: Prompt families to update their details with Services Australia.**

ACSSO believes the recommendation for the Australian Government to use Single Touch Payroll (STP) information from the Australian Tax Office (ATO) to prompt families to update their activity and income level details with Services Australia is a concept that carries both potential benefits and concerns. Recognising the sensitivities around government data integration, it's important to approach this recommendation with a balanced perspective.

On the one hand, utilising STP data can streamline processes for families, reduce administrative burden, and ensure accurate calculation of entitlements such as childcare subsidies or family tax benefits based on up-to-date income information. This proactive approach can prevent discrepancies and overpayments, thereby reducing unexpected debts.

However, there are legitimate concerns regarding privacy, data security, and the potential overreach of government surveillance. It's crucial that any integration of data between the ATO and Services Australia is conducted with the highest standards of data protection and privacy. It's important to have transparent communication about how the data will be used, who will have access to it, and the safeguards in place to protect it. This will help build and maintain public trust.

Furthermore, there's a need to consider those who may be apprehensive about increased government monitoring of their financial information. An opt-out option or alternative methods for updating their details could be a way to respect individual preferences and sensitivities.

While the use of STP data by the Australian Government to prompt families to update their details with Services Australia has the potential to make bureaucratic processes more efficient and accurate, it must be implemented with stringent privacy safeguards and clear, transparent communication to address any public concerns regarding privacy and data security. ACSSO believes that an approach that balances efficiency with respect for individual data rights and sensitivities will be key to the successful implementation of such a recommendation.

**Draft recommendation: Provide better information to families about CCS withholding rates.**

ACSSO supports this recommendation - The Australian Government's commitment to transparency and support for families can be significantly enhanced by providing clear and easily accessible information regarding the Childcare Subsidy withholding rate during the application process and when updating details with Services Australia. This approach would ensure families are fully informed about their financial commitments and entitlements, fostering a more supportive and efficient system. By simplifying access to this crucial information, the government can help alleviate potential confusion or misunderstanding, leading to a smoother administrative process for families and aiding them in making informed decisions about their childcare needs.

**Draft recommendation: Amend the Disability Standards for Education**

ACSSO supports that the Disability Standards for Education 2005 (Commonwealth) should be broadened to cover the entire spectrum of services offered within the early childhood education and care sector. It is well-established that inclusion in early childhood is a crucial foundation for lifelong learning and participation. Therefore, extending these standards to all early childhood services aligns with our commitment to inclusive education and ensures that every child, regardless of their abilities, has access to equitable education and care from the earliest possible stage. The amendment will foster a more inclusive, supportive, and effective educational environment, laying the groundwork for a more inclusive society. It is an essential step towards fulfilling our collective responsibility to uphold the rights and meet the needs of every child.



Draft recommendation: Amend eligibility requirements for inclusion funding.

Collaboration between the Australian Government Department of Education and Inclusion Agencies is essential. It is important that they work together to simplify the documentary requirements for the receipt of Inclusion Support Program (ISP) funding. The emphasis should be on the eligibility of children without a formal diagnosis. This is important because many children with additional needs may not have a formal disability diagnosis. Services seeking to access the Inclusion Development Fund Subsidy for an Additional Educator and the Family Day Care Top-Up must accept evidence of additional needs beyond just disabilities. This is crucial to ensure that every child, regardless of their diagnostic status, has access to the necessary support and resources. Additionally, increasing the funding allocated to the ISP is necessary. This will provide a more robust support system, ensuring that children receive the comprehensive assistance they need to thrive in their educational environments. Enhancing the ISP aligns with inclusive education principles and significantly contributes to the development of a more equitable and accessible early childhood education system in Australia.

Draft recommendation: Review and amend additional educator subsidies.

ACSSO Supports the recommendation to provide a subsidy that covers 100% of an additional educator's wage, up to the median hourly wage of a Certificate III qualified educator., and that this rate should be indexed to the Wage Price Index so that it remains relevant and supportive over time.

The subsidies should also be flexible enough to cover the full range of a child's enrolled hours. This change would ensure that children with additional needs receive consistent and comprehensive support throughout their educational experience.

To make the subsidy more inclusive, we propose that the range of professionals eligible to be employed as an additional educator be expanded. This should include human-services qualified staff and inclusion professionals, such as allied health or other relevant professionals, especially when deemed appropriate by the Inclusion Agency.

These amendments, we believe are not just administrative changes, but they are fundamental to creating an inclusive and equitable early childhood education system. By ensuring that educators and services have the necessary resources to support all children, especially those with additional needs, we can foster a more inclusive, diverse, and rich learning environment. This approach aligns with our commitment to providing every child with the best start in life, regardless of their individual circumstances.

ACSSO supports the following recommendations.

- Draft recommendation: Reduce administrative burden of Inclusion Support Program applications.
- Draft recommendation: Improve coordination of inclusion funding between governments.
- Draft recommendation: Ensure integrated services are available where needed.
- Draft recommendation: Support connections between ECEC and child and family services.

Draft recommendation: Introduce a higher hourly rate cap for non-standard hours.

ACSSO believes that it's important for the Australian Government to adapt to the changing needs of modern families, especially those with non-standard working hours. A revision of the hourly rate cap for ECEC services provided during these hours is crucial.

When addressing the needs of modern families, the higher rate cap should apply to all types of ECEC services, but it's important to acknowledge and reflect the varying costs associated with different



service types by setting distinct rates for each. This approach ensures fair and realistic compensation for the additional operational costs incurred during non-standard hours, and the higher rate cap should be based on the cost of providing ECEC during non-standard hours and should be subject to regular reviews and indexation to ensure its relevance and effectiveness over time.

By implementing these measures, the Australian Government will take a significant step towards supporting families relying on ECEC outside of standard hours. This helps meet the diverse needs of working parents and ensures that children continue to receive quality care, regardless of the time of day.

ACSSO Supports the following recommendations.

- Draft recommendation: Examine planning restrictions related to operating hours.
- Draft recommendation: Ensure occasional care is available where needed.
- Draft recommendation: Support out of preschool hours ECEC.
- Draft recommendation: State and territory regulatory authorities should improve their performance reporting.
- Draft recommendation: Ensure regulatory authorities are adequately resourced.
- Draft recommendation: Incentivise quality provision in new ECEC services.

*Draft recommendation: A new review of the National Quality Framework*

The proposal to commission a review of the National Quality Framework (NQF) through the Education Ministers Meeting is a commendable step towards enhancing the quality of ECEC in Australia. Focusing on the assessment methods against the National Quality Standard and seeking ways to improve accuracy, consistency, and efficiency is indeed vital. However, it's crucial to consider the independence of this review process.

To ensure the review's objectivity and impartiality, it should be conducted by an independent body separate from ACECQA. While ACECQA plays a pivotal role in overseeing the NQF, having an external body conduct the review at arm's length would provide a fresh perspective and prevent any potential conflicts of interest or bias. This approach would enhance the credibility of the review and its findings.

Regular reviews of the NQF are essential, as they allow for the incorporation of ongoing feedback from ECEC providers and the integration of new research findings on the links between ECEC quality and children's outcomes. These reviews should be structured to capture a wide range of perspectives, including those of educators, parents, and researchers, to ensure a comprehensive understanding of the sector's needs and challenges.

While the review of the NQF is necessary and timely, its conduct by an independent body will ensure that the outcomes are balanced, credible, and effectively contribute to the continuous improvement of the ECEC sector in Australia.

ACSSO supports the following recommendations.

- Draft recommendation: Ensure appropriate quality regulation for services outside the scope of the National Quality Framework
- Draft recommendation: Improve policy coordination and implementation.

*Draft recommendation: Establish an ECEC Commission*

ACSSO believes that implementing a stewardship model in Australia's ECEC system would be a strategic move towards addressing current challenges and achieving a more unified and effective approach. Supported, as recommended, by the formation of an ECEC Commission as part of a new



National Partnership Agreement. It represents a significant step forward in coordinating and enhancing the delivery of ECEC policies across Australian, state, and territory governments.

Establishing an ECEC Commission as part of a stewardship model presents an opportunity to streamline efforts, enhance accountability, and ultimately steer the sector towards universal access and improved outcomes for children and families across Australia. This collaborative and data-informed approach is key to building a more efficient, effective, and equitable ECEC system.