

# Royal Commission into Early Childhood Education and Care

## South Australian Government Response to the Interim Report

May 2023



# Acknowledgement of Country

We acknowledge and respect Aboriginal peoples as the state's first peoples and nations and recognise them as traditional owners and occupants of land and waters in South Australia. Further, we acknowledge that the spiritual, social, cultural and economic practices of Aboriginal peoples come from their traditional lands and waters, that they maintain their cultural and heritage beliefs, languages and laws which are of ongoing importance, and that they have made and continue to make a unique and irreplaceable contribution to the state.

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# Introduction

The South Australian Government welcomes the opportunity to provide feedback on the interim report and 33 in-principle recommendations of the Royal Commission into Early Childhood Education and Care.

The interim report reflects the huge task ahead for South Australia: to build an early childhood development system that uses the best of today's knowledge and is continuously tested and refined. The findings of the Royal Commission reaffirm the importance of the commitment the government has made to the provision of universal, high-quality 3-year-old preschool in South Australia.

The government is supportive of the purpose and guiding principles proposed by the Royal Commission. The government welcomes the Royal Commission's focus on partnering with non-government early childhood education and care services and the proposed role for government in supporting quality across the sector by acting as a system steward. However, the government also remains committed to the right of families to choose the public education system for their child's early education.

The government is also strongly supportive of the Royal Commission's focus on fairness, quality, building connections, and embracing all children. The government considers these to be fundamental priorities in underpinning the value of a universal preschool system.

The Royal Commission's principle of progressive universalism is welcomed. The government notes the value of preschool as a means to redress disadvantage and welcomes the Royal Commission's inclusion of additional measures to identify and support children at risk of developmental delays and to maintain additional supports for Aboriginal children.

## Service delivery model

The Royal Commission has recommended in-principle that, upon rollout, preschool be delivered through a mix of government and non-government provision, with 3-year-olds already in long day care or non-government preschool receiving their preschool through that setting respectively. The government sees the value in a mixed model approach, in that it is likely to have the broadest reach, it makes greatest use of existing capacity, and it is likely to be the quickest to roll out.

The Royal Commission notes that it is yet to understand what preferences families might have for accessing universal preschool at age 3. However, it has made assumptions about family choice in relation to 4-year-old preschool; for example, the interim report notes that families currently access both preschool and long day care and that this may be because they want something different for their child, long day care can't offer them the number of days of care they need, or the lower cost government preschool may unlock additional hours of work that were not financially viable at the cost of a long day care place.

The interim report also states that there are many families who value government preschool over and above long day care, as demonstrated through 4-year-olds attending both a long day care and government preschool. However, the government is aware that session times in government preschools often do not meet the needs of working families, and that opportunities to provide before and after care at government preschools need to be further explored.

The Royal Commission is encouraged to undertake further research to test its assumptions about the likely pattern of demand and usage of both long day care and government preschool, including whether the provision of before and after care at government preschools would influence families' choices. This will ensure that the model for 3-year-old preschool delivery allows for family choice and that capacity and workforce in both the non-government and government sectors can meet demand.

Further to this, the government notes that additional capacity in government preschools will be offered on a priority basis to 3-year-olds who are not already engaging in early childhood education care. The Royal Commission has noted that it tends to be the most disadvantaged children most commonly not accessing long day care. The government encourages the Royal Commission to consider whether this method of capacity management may result in unintended consequences, such as patterns of usage or attendance that concentrate, rather than address, disadvantage.

Under current policy, the government aspires for every child to have access to a high-quality educational preschool program in their local government preschool in the year before fulltime school. This policy aims to ensure that preschool is accessible and low-cost. Where 3-year-old preschool is delivered through long day care, a child's local preschool program may be delivered by a long day care service, with the family meeting the gap between childcare subsidy funding and the cost of the program. The government would welcome further consideration of how the model can meet the aspiration for every child to have access to their local preschool program.

Often government preschool enrolments feed into school enrolments, with families wanting their child to undertake their schooling with the friends they have made during their time in preschool. The Royal Commission is encouraged to consider the impact that any model of 3-year-old preschool may have on future school enrolments across both the government and non-government sectors.

The government welcomes the opportunity to strengthen partnerships with the non-government sector and agrees with the notion that a mixed model can facilitate a connected preschool system. The government notes that under a mixed model of service delivery, to meet demand, new places would be created through the equivalent of 32 new services (29 non-government and 3 government). The government recognises the opportunity for these investments in infrastructure to be made on or close to public school sites, where it meets the needs of the community and there is available space. The Royal Commission is encouraged to look further into this matter, as this could provide opportunities to maximise the wide spread of government assets to support greater reach, increase partnerships between non-government and government providers and achieve greater continuity of services for families.

The findings of the interim report are clear that 3-year-old children must be at the centre of any plan. Given this, the government would welcome further clarity on how the proposed model of 3-year-old preschool will interact with the existing 4-year-old programs offered in South Australia to form a

cohesive 2-year preschool program that promotes the best outcomes for the child while supporting family choice. This includes the effect on market dynamics, the impact on government preschool enrolments for 4-year-old preschool, and how it looks from the perspective of the child in terms of continuity of learning and building collaborative relationships with teachers and educators

The government notes that under the Royal Commission's recommended implementation approach, over half of children who are not already enrolled in long day care at age 3 will receive their 3-year-old preschool in a government preschool or newly commissioned high-quality integrated site. The integrated sites would be established in areas of high developmental vulnerability. This in-principle recommendation is welcomed by the government, as it recognises the important role that integrated sites can play in strengthening families in the early years.

## Workforce

The government welcomes further clarity from the Royal Commission on the proposed staffing configurations for preschool, in both the government and non-government sectors, noting that each child will receive their learning entitlement from an early childhood teacher. The government is willing to participate in further discussions with the Royal Commission about this matter, noting that the government preschool workforce has a higher number of degree qualified staff delivering a preschool program than other parts of the sector, and this is a contributing factor for high-quality service provision.

## Fees

The government has made a commitment to the provision of high-quality preschool and recognises the significant investment that needs to be made to achieve this.

The Royal Commission has recommended in-principle that the current approach to parent fees in the government and non-government preschool sectors be adopted for 3-year-old preschool delivery. Currently, where long day care providers receive funding from the government to run a preschool program, they are not required to pass this saving onto families through a reduction in fees.

The Royal Commission has found that, irrespective of the model chosen for 3-year-old preschool, it is likely that impending changes to the Child Care Subsidy will result in more families choosing long day care centres for their 4-year old preschool program, despite it being more costly than government preschool. The government would welcome further testing of this assumption as part of considering family choice, particularly in light of rising cost of living pressures.

The government notes the recommendations made directly to the Commonwealth to improve the affordability of long day care and welcomes the Royal Commission's initial considerations of the roles of the Commonwealth and that of states and territories. In addition to this, the government would welcome the Royal Commission identifying further strategies to achieve affordability across all settings, noting that targeted fee relief has already been proposed.

# Additional preschool entitlement

The Royal Commission has proposed that children at risk of developmental delay should be able to access up to 30 hours of preschool per week and has welcomed feedback on how this additional entitlement could be targeted. The government welcomes this focus on supporting those who are most vulnerable.

For this to be effective, developmental delay needs to be recognised as early as possible, noting that this requires state-wide accessibility to enhanced screening programs and sufficient workforce capacity and capability. In considering how additional hours of preschool are to be targeted, the Royal Commission may wish to consider whether there would be value in other criteria in addition to children at risk of developmental delay; for example, additional hours could be offered to children at risk of entering the statutory child protection system or to children with disability. Further investment in expanding targeted programs and supports could also be considered.

Similarly, and noting the in-principle recommendation to provide additional supports to Aboriginal children, the Royal Commission may wish to consider whether a targeted program would be suitable for children in care. As with Aboriginal children, children in care are currently entitled to attend 3-year-old preschool and may benefit from additional supports once 3-year-old preschool is universally accessible.

In targeting the additional entitlement, the government encourages the Royal Commission to develop a clear definition to ensure children most in need receive the entitlement and to enable an understanding of the impacts on site capacity and the investment required.

## Stewardship and governance

The Royal Commission has proposed a broader role for government that involves supporting quality across the sector, increasing enrolments and uptake through outreach and removal of barriers, managing capacity across the system, commissioning new services, and undertaking relevant research and evaluations. The Royal Commission has sought further feedback on appropriate governance mechanisms.

The government acknowledges that sector stewardship is important to facilitate the Royal Commission's model, and that government is best placed to fulfil this role. Stewardship provides opportunity for the government to not only deliver quality services directly but to drive further improvements in quality and connectedness across the early childhood development sector.

To ensure that the stewardship role is effective and is free of unconscious bias, the government considers the governance model should involve separation between the stewardship and service delivery functions. The model should also ensure a clear distinction between the role of the steward in supporting the sector and the role of the regulator in ensuring legislative compliance, while also supporting a close relationship and information sharing between the two functions. Existing structures

within government, including the Department for Education, the Education Standards Board, and the Office for the Early Years, may be suitable starting points for a governance structure.

The government also notes that the role of a steward in supporting quality across the sector cannot replace the duty of providers to meet legislative standards and to support the development of its educators and other staff. The government encourages the Royal Commission to consider how the roles and expectations of providers and employers intersect with the role of a steward.

## The national conversation

The government notes discussion in the interim report of the potential to have a national conversation about a consistent approach to roles and responsibilities in the early childhood education and care sector. The government considers that a good starting point for this discussion is the framing provided by the Royal Commission.

As set out by the Royal Commission, states could take responsibility for supporting quality in the early childhood education and care sector and for establishing early childhood education and care as a backbone for early childhood development services, noting that these services are often funded by government.

The Commonwealth's role could be framed as fulfilling a role of supporting accessibility, with a particular focus on cost reduction and consideration of how it can support infrastructure needs, particularly in community-managed early childhood education and care services in regional and remote areas. While the Royal Commission has recommended that state government consider taking on this role, it is arguable that this may better align with a role in ensuring the accessibility of services.

Consistent with the draft National Vision on Early Childhood Education and Care, the government would welcome the Commonwealth taking a strategic market stewardship approach to ensuring that early childhood education and care is available to all families who choose to use it, regardless of their location, cultural background, or ability to pay.

## Conclusion

The government notes the detailed costings provided by the Royal Commission relating to the delivery of 3-year-old preschool. The government recognises that funding for preschool provision will be only one component of this investment in our state's future, and that the support structures for the delivery of preschool, as well as for reforms to out of school hours care and in the first 1000 days, will require significant investment from government. However, there is a need to get return on investment for any public funding, including accountability measures, that does not increase inequity in South Australia's education system.

The government is under no illusion about the size of the task ahead of it, including the significant cultural shift required to move from a system of government delivery of preschool to a mixed model underpinned by proactive sector stewardship. It is evident that the Royal Commission's proposed



approach to implementing 3-year-old preschool aims to strengthen the system overall and allow for the principles of high-quality preschool to be embedded across both the government and non-government sectors. Noting that implementation will commence from 2026, the government welcomes further consideration of how the sector can be supported to quickly reach a consistent level of quality within current workforce constraints.

The government considers that quality must be a guiding factor in any recommendations on how the model should operate and encourages consideration of the risks inherent in cultural change and how these might be addressed.

The government welcomes the considered approach to implementation proposed by the Royal Commission, which provides the opportunity to trial and learn from the roll out, and adjust implementation based on the availability of workforce. The government agrees that these are critical elements to ensuring success of this reform.

The government again thanks the Royal Commission for its detailed interim report. The government looks forward to receiving the final report and supporting modelling and getting to work on this once-in-a-lifetime opportunity to transform the lives of South Australian children and families.