

## Royal Commission into Early Childhood Education and Care

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### Interim Report

Thank you for the opportunity to respond to the Royal Commission into Early Childhood Education and Care Interim Report (April 2023). This letter follows on from [my submission in relation to 3-year-old preschool](#) and [my submission focusing on out-of-school-hours care \(OSHC\)](#).

As South Australia's Commissioner for Children and Young People, my mandate under the *Children and Young People (Oversight and Advocacy Bodies) Act 2016* is to promote and advocate for the rights and interests of all children and young people in the State and ensure the State satisfies its international obligations, including in relation to the United Nations Convention on the Rights of the Child.

As a systemic advocate for children and young people I have read the Interim Report through a rights lens and considered what it would actually deliver for children in South Australia. As it stands, the Interim Report appears to be more of an investment for the market than an investment in our State's children or their outcomes.

**One of my key concerns with the proposal for 3-year-old preschool was that it would simply be 4-year-old preschool for 3 year olds**, as clear in my 3-year-old preschool submission. While the Interim Report recommendations do make some recognition of the specific needs of 3 year olds and how preschool can best cater to this age group (e.g., Recommendations 8 and 26a), overall there is not enough detail provided of what 3-year-old preschool will actually look like. It's unclear how the content and structure of 3-year-old preschool will differ from 4-year-old preschool to make it appropriate to this age group, while also taking into account diversity amongst children of the same age. This is not just a concern of mine, as noted in the Interim Report itself (p. 41).

**Not all 4 year olds are currently attending preschool, nor receiving quality services.** The Interim Report does not appear to adequately address these equity and quality issues that currently exist for 4 year olds attending preschool. If families aren't able to access preschool services for their 4-year-old children, it is unlikely



that families will be encouraged to do this when their children are at a younger age without significant changes to the system. This is particularly important for the State's most vulnerable families who may not want to engage in early childhood systems due to intergenerational disengagement and distrust of services, as outlined in my submission. This is something which is not adequately addressed in the Interim Report.

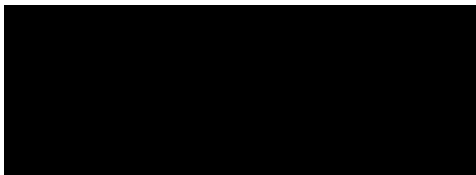
As I also detailed in my submission, if a key purpose of 3-year-old preschool is to address disadvantage and benefit all children, then preschool needs to be viewed in the broader context of children's lives, and as part of a **broader integrated early years system**. While 'layering supports' is mentioned (Recommendations 11 and 12), a more comprehensive system across the early years is needed to benefit all children, including the most disadvantaged in our State. As the Royal Commission will be aware, the federal Early Years Strategy is currently in development, and I encourage you to also consider [my submission to the Early Years Strategy](#). An integrated early years system considers all of children's rights in relation to a broad service system for the early years.

I also advocated for **place-based services with general principles but capacity to build local solutions** in my submission. The importance of local communities is only briefly mentioned in the Interim Report recommendations (e.g., Recommendations 2a and 2e). It is my position that an ongoing formal process of co-design and consultation with local families will likely lead to higher levels of engagement and attendance than a top-down approach.

The Royal Commission needs a forward-thinking strategy on the early years system more broadly, not just early childhood education and care. We need a new Public Health approach that will actually deliver real change for children, along with their families and communities, that will be relevant for the next ten years. This is an opportunity for South Australia to be ahead of all other states when it comes to supporting and investing in children in a meaningful way, which in turn will result in a thriving South Australia.

If you would like to discuss anything further, please do not hesitate to contact my office.

Yours sincerely



**Helen Connolly**  
**Commissioner for Children and Young People**