

May 2023

## Response to the Royal Commission into Early Childhood Education and Care Interim Report

Gowrie SA thanks the Royal Commission for the opportunities to be part of the Roundtables, for the transparency of the public hearings, and for the sector-wide consultation. The interim Report reflects many of the learnings and views that have been shared over the past few months.

We appreciate the Commission's commitment to universal three-year-old preschool delivered through mixed provision. The interim report states that 'The Commission's recommended approach will be to ensure there are no winners or losers depending on where a child accesses their preschool' and we look forward to seeing this be realised in practice.

We were particularly heartened at the recognition of ECEC services as a 'backbone' universal infrastructure for early childhood development and with the recommended funding are excited at the possibilities for a positive impact on children and families.

We are supportive of the many recommendations in the Interim Report and will take this opportunity to make some further comments for consideration regarding the recommendations below.

**Recommendation 4: Trial different configurations of early learning programs delivered by Diploma qualified educators (for example, with practice supervision, with additional professional learning, with different ratios, with coaching and so on), review the quality of practice and rigorously assess the different outcomes**

We would question whether this proposes some risks and messaging issues. In essence the Royal Commission has heard evidence about providing high quality preschool programs and interventions, delivered by degree qualified teachers, with measures in place to ensure rigour, but this Recommendation also suggests that ECTs may not be required.

There are indeed significant workforce issues, and these are unlikely to be reduced without a comprehensive state wide 10-year workforce plan, with input from providers, tertiary and secondary school sectors, employers, educators, teachers, and peak bodies, that is monitored and updated on a regular basis. Investment at both state and commonwealth levels in wages and conditions is also needed to reduce attrition and create professional career structures that are recognised and valued by the community.

We wonder whether governments would trial classroom teachers holding a Diploma level qualification to address teacher shortages, and if not why would we endorse this for our youngest citizens? We believe that as a minimum, at least one ECT should be a requirement when delivering a preschool program, as well as practice supervision by an ECT or established preschool site (whether government or non-government). Should Diploma qualified staff be used, we would suggest some additional criteria such as having a minimum level of ECEC experience as well as being enrolled and actively studying

toward an ECEC degree qualification. Such trials should have an established ECEC site providing guidance and resources.

The risk becomes that what we do as a temporary measure becomes the norm over time.

**Recommendation 8: That the State Government reflect the range of developmental needs of three-year-olds in implementing three-year-old preschool, including by developing professional learning for early childhood educators and teachers on early child development, with emphasis on the capabilities of three-year-olds and four-year-olds.**

There is already a wealth of professional development available to the ECEC sector, including resources, short sessions, team sessions, coaching and mentoring programs, and this recommendation could be broadened to recognise and promote preferred providers who have been delivering quality training over the long term.

**Recommendation 10: That, as part of implementation, consistent with outcomes measurement, the State Government continue to build the evidence base of the following, with a view to informing future program design**

Given there are already ECEC sites delivering preschool programs that include three year old children, there are opportunities to commence funded evaluation activities sooner rather than later, which may further inform delivery.

**Recommendation 14: That the State Government have a targeted focus on improving the NQS ratings of non-government services currently providing State Government funded preschool programs who are 'working towards', including working with the regulator (the Education Standards Board) to ensure that action is taken for consistent non-achievement.**

Given the Royal Commission is convened by the state government, it is a fine balance to reflect all views equally. To that end, we would comment that on occasion through the report, there is an implicit positive bias toward the state government preschool sector. This can be seen on page 23, 'increasing quality requirements in long day care', again on page 104, and in this Recommendation. Any service delivering a preschool program should be included in this Recommendation, not just non-government services.

Under the former Professional Support Coordinator (PSC) model, services with a Working Toward rating were referred to the state-based PSC to access professional development support to improve their rating. There is currently no such program in place and it may be worth revisiting elements of the PSC model to support 'working towards' services delivering preschool programs.

**Recommendation 16: That the State Government commit to co-designing and rigorously evaluating a small number of alternative early learning models for three-year-olds in specific communities where there are very low rates of enrolment in a traditional four-year-old preschool program. These programs should be funded at a rate of approximately \$11,500 per child (indexed) (based on current per child cost of provision of government preschool). Rigorous evaluation is required, and models and service providers may alter with evaluation. However, ongoing funding should be allocated to the overall program on the basis of an assumed rate of uptake in specified communities. ( Also linked to Recommendation 20)**

A level of current ECEC expertise should also be required to inform and ensure any program for an alternative early learning model supports eventual child and family engagement with what are essentially white, westernised models of educational systems. Alternative models that don't support transitions to government education systems in systematic and culturally safe ways risk failure. To ensure rigor in program formation and delivery, input by current practitioners or organisations with ECEC expertise is vital.

Not requiring a workforce with formal qualifications has quality risks, but also potentially devalues any subsequent program and may impact on evaluation outcomes. Any suggestion that children in identified communities have access to a lesser qualified workforce entrenches ideas of which children across the state are valued over 'others'. Working with state government training funders to ensure equitable access to culturally relevant and accessible VET and tertiary qualifications would be a far more powerful way to support all communities and their children.

We also wonder how sustainable such programs will be over the long term (and with potential changes to government). Perhaps a better model could be to improve resourcing of existing community ECEC sites (preschool or long day care). This would include funding for food, high quality resources such as books, toys, furnishings, and additional staffing, sourced from the local community who will support education environments to be culturally safe and accessible. Additional professional development would be offered. These ECEC programs could then add-in innovative programs which draw in families from the community, providing safe ways to access early learning and support brokering of family engagement with government education systems. The focus of these programs would not be on *families who are hard to reach*, but for families who find *services hard to reach* (p. 75). Skattebol et al. (2014) conducted research in this area which may be helpful:

<https://www.unsw.edu.au/content/dam/pdfs/unsw-adobe-websites/arts-design-architecture/ada-faculty/sprc/2021-06-Families-at-the-Centre-What-do-low-income-families-say.pdf>

We would suggest that there are already useful programs which could be utilised or adapted in consultation with community. Gowrie SA has recently implemented a newly created Teach-Do-Learn Program which focuses on AEDC outcomes and access to allied health professionals and resources for families of children birth to five years. A former program, Through the Looking Glass (TtLG), was delivered over a 15 year period with state then federal funding to support families with identified attachment difficulties with their young children, and listed as an evidence-based program through the Australian Institute for Family Studies (AIFS). The model was locally co-designed and included 2 days fully funded access to the onsite ECEC program, as well as access to a group program delivered by a social worker and qualified educator. Staff roles were to support the building of parenting skills, as well as connect families to local services to meet their basic needs, and to support access to a high quality early learning program. The external program evaluation was very positive, and from this further parenting programs were developed including Encircle and supported playgroups.

A question for the Royal Commission is whether funding recommendations will include intellectual property or licensing costs, and the cost of any external evaluation. It will also be important to understand the eligibility of local providers, communities or local service commissioning, and if these will be secular?

Page 116 mentions lowest-cost interventions, but if, as per Recommendation 33 this reform is understood in terms of investment, then the cost should be proportional to the intervention and outcomes for children. High quality and effective early interventions are difficult to achieve at low-cost.

**Recommendation 18: d. In other areas, unmet demand be met by a managed market response, matching parent demand with cost efficient increases in supply..**

It is far more likely that large private providers will respond to a market opportunity. Such services have the staff team available to do so, and this will restrict applications and reduce opportunities for the not for profit sector. We already see disproportionate market expansion by private providers with no opportunities to redress this balance. We would ask whether state government procurement processes should have an obligation to prioritise and support not for profit organisations to be set up in areas of need.

**Recommendation 19: That the State Government work with the sector to articulate agreed markers of preschool program quality in different settings.**

With a nationally applied National Quality Standard, and national curriculum Framework in place, there may be confusion in creating additional quality markers which sit outside of these Standards and Frameworks. Any changes should be made within the Standards or curriculum Framework. The Department for Education can tend to produce multiple layers and documents which can sit on Director shelves due to the overwhelming nature of multiple guiding documents.

**Recommendation 21: That the State Government note the Commission seeks further submissions on the proposal to operate a 'kindy tick' program to publicly communicate to families where a State Government accredited preschool program is operating.**

We believe that an overall marketing program should be conducted by the state government so all parents understand that high quality preschool which meets state government standards can be accessed across different settings. A 'kindy tick' program then supports families to understand that a particular setting meets the requirements to deliver a preschool program.

**Recommendation 27: That State Government support for additional capacity through investment in capital works (minor or major) be predicated on the nature and quality of the early childhood education and care system it envisions.**

We welcome initiatives to provide financial support which can be utilised for capital works. We know that in Victoria, the government is providing approximately \$2 million for the creation of 2 extra preschool rooms at one site. This funding was increased recently in recognising the significant increases in development costs.

**Recommendation 28: That the current approach to parent fees in the government preschool and long day care and non-government preschool sectors be adopted for three year-old preschool delivery, noting the targeted fee relief recommended at Recommendation 25.**

As stated in the report, the average preschool fee for government services, is \$122 per term. This is far more affordable than the fee reduction able to be set under Universal Access funding. An average CCS rate of 50% would mean that a parent accessing preschool at a long day care site could pay upwards of \$30 per day. The number of approved hours will also have an impact so if a family uses more hours than approved under CCS, they may have to pay the full cost. Unfortunately, the Royal Commission has not addressed this funding inequity between government and non-government services, as Universal Access funding is not enough to allow a service to reduce preschool fees to no or low cost. This continues the disparity for families whereby some will be able to access a place in a government preschool and pay significantly less for what will essentially be the same educational program. According to the Deloitte

Access Economics model specification, the per child funding differential is almost \$9,000. If including the average per child commonwealth subsidy there is still a discrepancy of \$4,700.

As stated in our previous submission, in order to provide a high quality program that meets the needs of families and competes on an equitable basis, Gowrie SA reduce our preschool fee significantly. In order to attract and retain ECTs we pay commensurate with state government ECT wages, not the Award. This means our preschool program runs at a loss and requires subsidisation by other programs to mitigate this loss. This is unlikely to be sustainable with the introduction of three year old preschool.

### **Concluding comments**

The workforce issues are acute now and actions at state and commonwealth levels are urgently required. A state ECEC workforce group should be convened to create a comprehensive workforce plan that addresses both current and future needs. This plan requires an implementation timeline and regular review points.

The Royal Commission Interim Report mainly discusses the implementation of 3 year old preschool with minimal reference to the First 1000 Days. Information from the Roundtables and hearings require analysis and may provide additional recommendations or changes to the recommendations in the Interim Report. For example, the recommendation to provide funding toward 'backbone' supports could be extended beyond preschool programs to include infant and toddler program delivery.

Aspirational reforms require significant investments and we would urge this state to value, invest in, and prioritise our early years programs in order to truly lead the way at national and international levels in both early intervention and education opportunities for children under 5 years.